

ROCKY MOUNTAIN ARSENAL NATIONAL PRIORITIES LIST SITE
RESPONSIVENESS SUMMARY FOR PARTIAL DELETION OF
THE INTERNAL PARCEL
JULY 2006

U.S. Environmental Protection Agency, Region 8

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A. OVERVIEW

The Rocky Mountain Arsenal National Priorities List (RMA/NPL) Site is located in southern Adams County, Colorado and is comprised of two operable units (OU), the On-Post OU and the Off-Post OU. The On-Post OU of the RMA/NPL Site originally encompassed 26.6 square miles approximately eight miles northeast of downtown Denver, Colorado. In 2003, 1.5 square miles (940 acres) of land on the western portion of the site known as the Western Tier Parcel (WTP) were deleted from the NPL, and in 2004, an additional 7.9 square miles (5,053 acres) of land along the perimeter of the site known as the Selected Perimeter Area (SPA) and Surface Deletion Area (SDA) were deleted from the NPL. The On-Post OU now encompasses 17.2 square miles (11,007 acres). The Off-Post OU addresses contamination north and northwest of the RMA proper boundaries. The Internal Parcel comprises approximately 11.5 square miles (7,396 acres) of the On-Post OU of the RMA/NPL Site in Commerce City, Colorado.

A remedial investigation (RI) for the On-Post OU completed in January 1992 studied each of the environmental media at the RMA/NPL Site including soil, sediment, structures, water, air, and biota. The *Record of Decision for the On-Post Operable Unit (ROD)* was signed on June 11, 1996 and specified the remedial actions for soil, structures, and groundwater. Based upon evidence gathered during the RI, twelve separate soil cleanup projects were identified within the Internal Parcel. In addition, 183 structures within the Internal Parcel were slated for demolition. Eleven groundwater contaminant plumes were identified below the western portion of the Internal Parcel and are being remediated through continued operation of groundwater treatment systems to remove the contaminants.

Remedial actions have been completed within the Internal Parcel for all surface media (soil, surface water, sediment), structures, and groundwater. The Internal Parcel includes

groundwater that is east of E Street with the exception of a small area in the northwest corner of Section 6. The rest of the On-Post OU, including groundwater below RMA that is west of E Street and the small area in the northwest corner of Section 6, and the Off-Post OU will remain on the NPL.

The 1992 *Rocky Mountain Arsenal National Wildlife Refuge Act (Refuge Act)* (Public Law 102-402) designates most of the On-Post OU of the RMA/NPL Site to become a national wildlife refuge once the cleanup is completed. Institutional controls (ICs) were incorporated into the *ROD* and apply to all RMA property after deletion.

B. BACKGROUND

On April 26, 2006, the U.S. Environmental Protection Agency (EPA) published a Notice of Intent for Partial Deletion (NOIDp) in the *Federal Register* (71 FR 24627) and in local newspapers proposing the deletion of the Internal Parcel from the RMA/NPL Site. The RMA Site-Specific Advisory Board (SSAB) requested additional time to adequately review the documentation. The public comment period for the NOIDp was extended through June 26, 2006 (71 FR 29880).

The NOIDp indicated that the Internal Parcel consisted of 7,399 acres of the On-Post OU in the interior of the RMA/NPL Site in Commerce City, Colorado. The Internal Parcel has been revised to 7,396 acres (11.5 square miles) to exclude a small 3-acre area corresponding to the Rail Yard Treatment System. The Rail Yard Treatment System is excluded from the Internal Parcel due to a delay in developing the Interim Construction Completion Report (CCR).

The EPA bases the deletion of the Internal Parcel of the RMA/NPL Site on the determinations by the EPA and the State of Colorado, through the Colorado Department of Public Health and Environment (CDPHE), that all appropriate actions under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) have been implemented to protect human health, welfare, and the environment and that

no further response action by responsible parties is appropriate. A public meeting to discuss the proposed partial deletion of the Internal Parcel was held on May 9, 2006. This Responsiveness Summary is in response to comments received during the public comment period, and is comprised of the following sections:

Section C: Comments Specific to the Proposed Partial Deletion of the Internal Parcel, and EPA's Responses

Section D: Additional Comments and Questions Received Regarding the RMA/NPL Site

Attachment A: Community Involvement Activities Conducted at the RMA/NPL Site Pertinent to the Internal Parcel Area

Attachment B: Comments Received Regarding Partial Deletion of the Internal Parcel Area

Attachment C: List of Acronyms and Abbreviations

C. COMMENTS SPECIFIC TO THE PROPOSED PARTIAL DELETION OF THE INTERNAL PARCEL, AND EPA'S RESPONSES

The public comment period for the proposed partial deletion of the Internal Parcel was open from April 26, 2006, to June 26, 2006. Questions received during a public meeting conducted on May 9, 2006, were primarily focused on characterization and biomonitoring. EPA received comment letters from ninety-four organizations/entities and individuals. Authors of eighty-eight of the letters voiced their support for proceeding with the partial deletions based upon their confidence in the thoroughness of the cleanup activities conducted by the Department of the Army (Army) and Shell Oil Company (Shell). Authors of six letters were opposed to the proposed partial deletion of the Internal Parcel. One of these letters, received from the SSAB, requested postponement of the deletion, stating that the 60-day review time was insufficient to review and resolve questions regarding characterization of the eastern portion of the Internal Parcel and their perception of unnecessary risk posed by deletion of the western portion of the Internal Parcel. In addition, several commenters questioned what they termed the piecemeal

approach to the Internal Parcel deletion. The primary comments in opposition to the proposed deletion are addressed beginning with Comment 2 of this section.

Comment Letters in Support of Deletion

(1) Eighty-eight letters supporting deletion of the Internal Parcel cited their support of the proposed deletion based upon their confidence in the thoroughness of the cleanup activities conducted by the Army and Shell. Letters supporting deletion were received from the RMA Wildlife Society, Audubon Colorado, Environmental Learning for Kids, and individuals, as well as a resolution from the Commerce City Council.

EPA Response: EPA agrees that the RI and post-*ROD* studies conducted have adequately characterized areas of contamination within the Internal Parcel. Remedial actions have been completed within the Internal Parcel for all surface media (soil, surface water, sediment), structures, and groundwater. Therefore, these areas do not pose a threat to human health, welfare or the environment. The rest of the On-Post OU, including groundwater below RMA that is west of E Street and the small area in the northwest corner of Section 6, and the Off-Post OU will remain on the NPL. Therefore, EPA believes it is appropriate to delete the Internal Parcel.

Potential Risk

(2) The SSAB comments expressed a concern regarding the potential risk for emissions from bordering areas of active surface remediation or subsurface contamination drifting onto deleted property. The SSAB indicated that much of the land proposed for deletion is adjacent to ongoing or future clean-up activities, where moving or capping significant contamination has not yet been completed. The SSAB considered that just because specific soil sites have been remediated within a property section, it does not mean that all the risks to receptors have been addressed.

EPA Response: The soil cleanup projects remaining on the NPL site include excavation of four remaining contaminated soil areas, installation of a slurry wall, construction of five cover systems over consolidation and landfill areas, clearance of munitions and explosives of concern (MEC) at the final remaining munitions areas, and demolition of remaining structures.

EPA ensures that human health is protected from on-going remedial activities through effective control of project emissions, restricting visitor access, and implementation of the *Site-Wide Air Quality Monitoring Program Plan (SWAQMP)* (2006), including monitoring of air emissions. Project emissions on a given project are controlled through various mechanisms, which include limiting the open excavation area, the excavation rate, the hours of operation, the seasons of operation, the placement area open at the landfill, and the transportation rate (i.e., the number of trucks); the application of emission controls, such as foam, geomembrane, or clean dirt; and the application of water to suppress dust. The extent to which some or all of these controls are implemented at the start of remedial construction is based upon emissions estimated during the design. After start-up, project emission controls may be modified based upon actual emission data.

Currently, the U.S. Fish and Wildlife Service (USFWS) visitor program allows visitors to enter the RMA National Wildlife Refuge (Refuge) only through the south gate and follow a designated road to the Visitor Center. This route is clearly marked by gates which bar entry to adjacent roads. Once at the Visitor Center, participants attend formal programs led by USFWS staff and volunteers or use the hiking paths along and south of Lake Mary and Lake Ladora. The current *Public Use Plan* (2004) prohibits public access in areas north of the Visitor Center and Lakes area. USFWS staff and volunteers patrol the entry road, hiking paths, and other program areas to ensure visitors do not stray away from allowed visitor areas. This management approach to allow restricted access for visitors will not change as a result of deletion. Any future revisions to the *Public Use Plan* (2004) will be subject to public review. A *Memorandum of Understanding for the Management of Access on Certain Portions of Rocky Mountain Arsenal National Wildlife*

Refuge and Rocky Mountain Arsenal National Priorities List Site (Memorandum of Understanding) (2005) restricting access to the northwest part of the Internal Parcel was developed as an additional precautionary measure.

In addition, air emissions are measured at the current fenceline and near the Visitor Center to verify that potential risks to visitors and the nearby communities are minimized. These requirements to control air emissions within the levels specified by the *SWAQMP* remain in place irrespective of the deletion of the Internal Parcel and are designed to be protective of human health. Air emissions and the *SWAQMP* are discussed in greater detail in Comment 9.

Adequacy of the Technical Memo

(3) The SSAB comment letter stated that the *Technical Memorandum* only summarized the areas investigated and remedial activities that had been completed and that additional technical information should have been presented - specifically, data to demonstrate the thoroughness of the RI performed and protectiveness of the risk assessment conducted. In addition, the SSAB comment letter stated that the structure of the *Technical Memorandum* increased the difficulty to assess whether the required response actions to protect human health and the environment are supported by the project data.

EPA Response: The SSAB comment is correct that the intention of the *Final Technical Memorandum in Support of Partial Deletion of the Internal Parcel Deletion Area (Technical Memorandum)* (2006) was to summarize the areas investigated and remedial activities that had been completed within the Internal Parcel. The 116-page *Technical Memorandum* was developed to consolidate key information, including data, contained within numerous, multi-volume documents listed in a thirteen page reference section of the *Technical Memorandum*. The *Technical Memorandum* provides the public a summary of the information specific to the 11.5 square miles that comprise the Internal Parcel without having to sift through documents that also contain information for the remainder of the RMA/NPL Site.

The *Technical Memorandum* is not a document required by the *National Oil and Hazardous Substances Pollution Contingency Plan (NCP)* for deletion. The *Technical Memorandum* summarizes the myriad of information and documentation that is available in the Administrative Record pertaining to the area of the Internal Parcel. All the referenced documents, as well as the complete Administrative Record, are available for public review and can be accessed at the Joint Administrative Record Document Facility (JARDF), Rocky Mountain Arsenal, Building 129, Room 2024, Commerce City, Colorado 80022.

The summary of the RI/feasibility study (FS), *ROD*, remedial design, and remedial construction in the *Technical Memorandum* is organized consistent with the sequence in which these processes occur in CERCLA. By having the organization of the *Technical Memorandum* mirror the CERCLA process, it was intended to concisely and clearly provide, in a single document, the documentation that all required remedial activities have been completed.

EPA Docket and Allocated Review Time

(4) The SSAB expressed a concern that the references identified in documents contained in the docket were not available, but were needed to adequately evaluate the proposed deletion. The SSAB requested postponement of the proposed deletion so that their concerns could be developed and more formally presented.

EPA Response: In the EPA Docket, EPA provided those primary references identified in the *Technical Memorandum* that support deletion of the Internal Parcel. Providing secondary references would require placing a large percentage of the Administrative Record within the docket, which is not required, nor practical. EPA considered and allowed that the Administrative Record could be used to support deletion. The *Close-Out Procedures for National Priorities List Sites* (Office of Solid Waste and Emergency Response (OSWER) Directive 9320.2-09A-P, 2000) states:

The Region prepares a deletion docket containing all pertinent information supporting the deletion recommendation. The deletion docket is not a continuation of the Administrative Record for the site. Documents in the Administrative Record can be referenced and do not have to be duplicated in the deletion docket (provided the Administrative Record is still available to the public).

In addition, one of EPA's goals for public involvement identified in EPA's *Public Involvement Policy* (2003) is to: "Solicit assistance from the public in understanding potential consequences of technical issues, identifying alternatives for further study, and selecting among the alternatives considered." Therefore, it is not EPA's expectation that the public will re-review documents from previous stages of the process within the comment period for this deletion; nor is it practical to provide a comment period that would allow independent verification of all the information and data from all preceding stages of the RMA project. However, the public is not limited only to reviewing the supporting information in the Administrative Record during the comment period for this deletion. The public can submit a comment at any time for consideration. Once a concern has been evaluated, a response regarding any actions to be taken will be developed and, if appropriate, placed in the Administrative Record.

Since 1988, each of the parties involved with the cleanup at the RMA has made extensive efforts to ensure that the public is kept informed on all aspects of the cleanup program. More than 100 fact sheets about topics ranging from historical information to site remediation have been developed and made available to the public. The designs for the remedial activities conducted within the Internal Parcel were generally provided to the public for a 30-day calendar review and comment period at both the 30 percent and 95 percent design completion stages. Each design was also presented for discussion at the regular meetings of the RMA Restoration Advisory Board, which is composed of community stakeholders, Regulatory Agencies, the Army, Shell, and the USFWS. No written comments regarding the implementation of the remedial activities or the proposed health and safety controls for each project were received. A summary of the community involvement activities pertinent to the Internal Parcel is included as Attachment A.

Five-Year Reviews

(5) Two commenters and the SSAB indicated that deletion should not occur until the Five-Year Review (FYR) for 2005 is completed and submitted for public review.

EPA Response. The Internal Parcel is part of the area subject to the FYR for 2005, a report which is still being developed. While once closely linked, site deletion has been separated from the FYR process since December 1991 (56 FR 66601). This is reflected in EPA's guidance document, *Close Out Procedures for National Priorities List Sites*, which indicates that a site can be deleted from the NPL without having the first FYR completed (EPA 2000).

In addition, the *Comprehensive Five-Year Review Guidance* (OSWER Directive 9355.7-03B-P)(2001) states:

It is EPA's policy that the Five-Year Review requirement is independent of and unaffected by the deletion process. Consistent with the *NCP*, a site can be deleted or partially deleted from the NPL once the deletion criteria have been satisfied. If a site has been deleted or is in the process of being deleted, your Five-Year Review Report should address the status of any deletion action. Five-year reviews continue as needed after deletion.

This separation is a result of the two different purposes for deletion and the FYR within CERCLA. The deletion process is intended to require an assessment of whether the remedial activities that were required by the *ROD* have been completed. The FYR process is intended to answer questions about whether the remedy, completed or not, is performing as it was required and whether the remedy is protective in the way that the *ROD* intended it to be.

The 2000 FYR has been completed and the remedy was determined to be protective of human health and the environment. EPA's review of the Five-Year Review Report (FYRR) covering the period April 1, 2000, to March 31, 2005 (2005), did identify several issues pertinent to the Internal Parcel. However, these issues were either addressed or the area was excluded from the Internal Parcel.

For example, Specific Comment 119 in EPA's *Technical Comments on the Draft Final Five-Year Review Report* (2005) indicated that the FYRR should consider new information, such as MEC findings at locations not previously thought likely to contain MEC since the last FYR. The Army resolved EPA's comment prior to publication of the NOIDp by documenting the locations of all MEC recovered site-wide at RMA. This report, *Summary of Munitions and Explosives of Concern Recovered on Rocky Mountain Arsenal During Remedy Execution* (2006), indicates that there have been no unexpected discoveries of MEC found outside of remedy project boundaries within the Internal Parcel area.

EPA Specific Comment 7 on the FYRR questioned the process for maintaining lake levels in support of the remedy. The *ROD* requires maintenance of lake levels for two reasons: hydraulic containment or plume control to prevent South Plants plumes from migrating into the lakes; and to support aquatic ecosystems while the lake water is used to support the remedial activities (e.g., for dust suppression). Prior to publication of the NOIDp, the following actions were taken to address these *ROD* requirements for the lakes.

- In 2004 (during the FYR period), the U.S. Geological Survey issued the results of a groundwater study to determine whether the contaminant plumes were reaching the lakes. The results, documented in the *Final South Lakes Ground-Water Monitoring Report June 1, 2001 – May 31, 2003*, indicated that contaminants were not entering the South Lakes even when the lake levels were very low. Based on the results of this study, an *Explanation of Significant Differences for Groundwater Remediation and Revegetation Requirements, Rocky Mountain Arsenal Federal Facility Site (ESD)* was prepared and approved on March 31, 2006. This *ESD* removed the requirement from the *ROD* to maintain lake levels for hydraulic containment purposes.
- In December 2005, the USFWS finalized a *Management Plan for Protection and Monitoring of Lake Ladora, Lake Mary and Lower Derby Lake During RMA*

Remediation (Lake Level Management Plan). This *Lake Level Management Plan* defined aquatic ecosystem goals, monitoring requirements, and minimum lake level requirements necessary to support aquatic habitat. *Lake Level Management Plan* requirements were incorporated into the Final *Interim Rocky Mountain Arsenal Institutional Control Plan (IRMAICP)* that was updated in March 2006.

Therefore, EPA has determined, with concurrence from the State of Colorado, that all appropriate actions under CERCLA for the Internal Parcel have been implemented to protect human health, welfare, and the environment and that no further response action by responsible parties is appropriate.

EPA will continue to require the conduct of FYRs at RMA in accordance with the most current revisions of the *Comprehensive Five-Year Review Guidance* (OSWER Directive 9355.7-03B-P), dated June 2001. The FYRs are conducted site-wide over the original NPL boundaries, which includes the Internal Parcel and the previously-deleted SPA/SDA and the WTP. The FYR process includes notifying the public that a review is being conducted. Additionally, fact sheets, public meetings, or community member interviews may be held at appropriate stages of the review. At the conclusion of the FYR, the public will be notified and a copy of the report made available (*Superfund Community Involvement Handbook*, 2002).

Areas Proposed for Partial Deletion

(6) Several commenters did not want to see any part of RMA deleted until the whole site is cleaned up. Commenters expressed concern that this approach would not be protective of human health and the environment and would result in a patchwork of cleanup sites surrounded by wildlife refuge activities. Commenters also expressed concern that the areas of remediation should be contiguous. One commenter used the example of additional contamination discovered along the Sand Creek Lateral after the area had been deleted from the NPL as justification for not proceeding with partial deletion.

EPA Response: The primary criteria used to determine if an area is suitable for deletion is found in 40 Code of Federal Regulations (CFR) 300.425(e), which provides for sites to be deleted from the NPL. Specifically, the Internal Parcel of the RMA/NPL Site meets the requirements of Section 300.425(e)(1)(i): "Responsible parties or other persons have implemented all appropriate response actions required." The Partial Deletions Rule was published on November 1, 1995, and was intended to allow portions of a site or an OU that have been cleaned up to be available for productive use, especially where total site cleanup may take many years (*Close Out Procedures for National Priorities List Sites*: OSWER Directive 9320.2-09A-P, January 2000). This description accurately reflects the ongoing cleanup at the RMA/NPL Site, which is over 50 percent complete, i.e., ten years of the fifteen-year schedule have passed and 16 of the 31 remedy projects have been completed.

Based on the best available information, the response actions for the sites have been completed, and there is no information to suggest that contamination may remain in the Internal Parcel. While there is always the possibility that contamination may be discovered in the future, as occurred with contamination on the banks of the Sand Creek Lateral within the SPA, at this time the Administrative Record supports deletion of the Internal Parcel. Although the area undergoing remediation associated with the Sand Creek Lateral is not within the Internal Parcel, the Sand Creek Lateral is discussed in detail in Comment 22 (Section D).

In order to communicate the successful cleanup of portions of sites, and promote redevelopment, EPA's policy on partial deletions explicitly approves deleting portions of sites when no further action is appropriate for that portion of the site. "Such portion may be a defined geographic unit of the site, perhaps as small as a residential unit, or it may be a specific medium at the site, e.g., groundwater..." (60 Fed. Reg. 55467, Nov. 1, 1995). The Internal Parcel deletion is consistent with other partial deletions that leave islands of NPL surrounded or abutted by deleted lands, e.g., Cecil Field, (68 Fed. Reg. 27746-27747, May 21, 2003). Contaminants requiring remediation rarely fill a section or confine themselves neatly to a section or regular pattern. In addition, much of the land proposed for deletion did not require remedial activities. In view of the policy that

encourages partial deletions within NPL sites, delay in deleting entire sections of land because small areas are required for continuing response actions is not necessary.

Timing of Deletion

(7) The SSAB wondered what is the great value to the people of Denver, the State of Colorado and even the Army that this deletion take place in fiscal year 2006 versus fiscal year 2007?

EPA response: As mentioned in the previous response, the requirements and conditions necessary for deletion to occur have been met. Once the requirements have been met, EPA can proceed with deletion at any time. Deletion communicates to the public the successful implementation of the remedy and progress toward final cleanup. It helps the Army achieve its goal of transferring property and furthers the purposes of the *Refuge Act*. The USFWS gains more property for the Refuge, which increases Refuge Revenue Sharing fees paid to Adams County.

In 2004, the Army requested that EPA proceed with deletion. One goal identified in the *RMA Federal Facilities Agreement (FFA)* (1989) states:

following certification of completion of the Final Response Action, for the On-Post Operable Unit, significant portions of the Arsenal will be available for open space for public benefit (including, but not limited to, wildlife habitat(s) and park(s)) consistent with the terms of this Agreement. Portions of the Arsenal will be made available for such use at the earliest practicable date consistent with any necessary Response Actions.

After deletion, the majority of the Internal Parcel will be transferred to the Refuge. The value in deleting this year rather than next is that it will allow achievement of the purposes of the Refuge to occur sooner. These purposes, as identified in the *Refuge Act* (1992), include:

- To conserve and enhance populations of fish, wildlife, and plants within the refuge, including populations of waterfowl, raptors, passerines, and marsh and water birds.

- To conserve species listed as threatened or endangered under the Endangered Species Act and species that are candidates for such listing.
- To provide maximum fish and wildlife oriented public uses at levels compatible with the conservation and enhancement of wildlife and wildlife habitat.
- To provide opportunities for compatible scientific research.
- To provide opportunities for compatible environmental and land use education.
- To conserve and enhance the land and water of the refuge in a manner that will conserve and enhance the natural diversity of fish, wildlife, plants, and their habitats.
- To protect and enhance the quality of aquatic habitat within the refuge.

Unidentified Potential Risks

(8) The SSAB requested that EPA consider what will be lost in the *NCP* principle and requirements of public participation, and what potential risks to the public may go unidentified in the future, before making its final decision to support this large deletion at this time.

EPA Response: CERCLA, as implemented by the *NCP*, requires specific community involvement activities that must occur at certain points throughout the Superfund process. EPA has provided reasonable opportunity for public participation in the deletion process that is beyond *NCP* requirements. An extension to the 30-day comment period was granted by EPA that resulted in a 60-day public comment period extending from April 26, 2006, through June 26, 2006. As exhibited in Attachment A, EPA has maintained an active public outreach program to notify interested community stakeholders, especially those who may be more directly affected in adjacent communities.

As stated in the NOIDp, EPA has determined, with concurrence from the State of Colorado, that all appropriate CERCLA response actions have been completed within the Internal Parcel to protect public health and the environment, and no further response action by responsible parties is required. For this reason, no additional monitoring,

assessments, or investigations of the media included within the Internal Parcel are planned. So, in the unlikely event that a potential risk may go unidentified, whether deletion occurs now or in the future does not have any bearing on the identification of that risk. Should additional contamination be found, EPA retains its authority to address threats to human health and the environment under Sections 104 and 106 of CERCLA as discussed in Comment 19.

Subsurface Soil

(9a) The SSAB expressed a concern regarding the lack of discussion of subsurface soil.

EPA Response: Surface media, including soil, in the context of the deletion, includes the RMA-defined surface and subsurface soil. The entire soil media is addressed within the NOIDp and the *Technical Memorandum*. For purposes of deletion, the use of the term “surface soil” applies to the entire soil media from surface to groundwater. Unlike the use of the term ‘surface’ or ‘surficial’ when applied to sampling soil, surface media pertains to all soil, sediments, and surface water which is above the highest groundwater aquifer. Separation of the soil media into RMA-defined subsurface and surface soil within the *Technical Memorandum* is unnecessary and would confuse the deletion.

The overall soil remedy for the RMA/NPL site requires excavation of much of the soil that exceeds acceptable contaminant levels for protection of human health (HHE) soil for disposal in the on-site hazardous waste landfills (HWLs). While the *ROD* identified specific excavation requirements for the upper one foot of soil (surface), specifically for soil posing an unacceptable risk to biota (biota) soil and acute HHE soil; once the depth and extent of contaminated soil to be excavated was defined, it was no longer necessary to distinguish between surface and subsurface HHE soil. Consequently, the designs for the soil remedies identified excavation depth and extent of HHE soil and, because all HHE soil regardless of depth was disposed in the on-site HWL, it was not necessary to maintain a distinction between the surface and subsurface soil. Individual CCRs document that the implementation of each project was conducted in accordance with the

ROD and associated approved final design and provide information showing the extent and depth of excavation. The CCRs identify total soil remediation volumes for each Study Area Report (SAR) site and do not distinguish between surface and subsurface soil volumes. The *Technical Memorandum* is consistent with this understanding.

(9b) The SSAB also commented on the lack of discussion about potential access to the subsurface through ecological activity and whether subsurface soil could be brought to the surface through future range activities, for example if buffalo are placed on the RMA Refuge.

EPA Response: As noted above, surface media in the context of deletion includes the soil profile from surface to groundwater. All human health and ecological-related response actions pertaining to the entire soil profile have been completed in the Internal Parcel.

The remedy is based on, and addresses, both human health and ecological exposure pathways. The future land use as a wildlife refuge was considered in the determination of the cleanup goals for the RMA. The RMA risk assessment evaluated risks to human and ecological receptors. As discussed in the *ROD*, the risk assessment to biota used soil concentrations in the 0 to 1-foot depth range for a biota's exposure area, with the exception of a 0 to 20-foot profile for the prairie dog exposure range. The risk to biota has been extensively evaluated in the *Integrated Endangerment Assessment/Risk Characterization (IEA/RC)* and *ROD*-directed studies, as summarized in the *Technical Memorandum*. The risk evaluations and completed remedial activities are protective of biota consistent with the future use of RMA as a wildlife refuge, which may include large grazing animals such as bison.

In areas where HHE soil is to be left in place (South Plants Central Processing Area, Complex and Shell Trenches), the area is segregated beneath a Resource Conservation and Recovery Act (RCRA)-equivalent cover, which includes an 18-inch layer of concrete cobble to prevent intrusion by burrowing animals through a cover into the contaminated

soils. While the habits of non-burrowing animals, such as bison or deer, can be somewhat destructive (bison wallows, deer trails); they are part of the Refuge's short-grass prairie natural ecosystem. As part of the regular operations and maintenance requirements, the Army is required to regularly assess all cover areas and take appropriate measures to repair any damage to covers whether from animals, weather, or human activity.

The *ROD* remedy also included backfill of the HHE-soil excavations to break the exposure pathway to biota. Where HHE-soil excavations were not backfilled, further sampling and excavation was conducted to eliminate risk to biota, as described in the *Technical Memorandum*.

Volatile Emissions

(10) The SSAB expressed a concern regarding the threat of volatile contamination within the groundwater reaching ground surface in deleted areas. The SSAB indicated that because groundwater plume migration is not actively tracked through mapping the on-post plume, it does not appear that the sections overlying the major plumes should be deleted.

EPA Response: Volatile air emissions from groundwater are typically of concern in residential areas where the water table is shallow and there is potential for containing volatilized chemicals in an indoor area, such as a basement, and is typically not a concern in outdoor areas at the ground surface. The potential health risks in the On-Post OU of the RMA/NPL Site were estimated prior to the *ROD* and are documented in the *IEA/RC* Report. The *IEA/RC* included an evaluation of a vapor inhalation pathway within an enclosed space to estimate inhalation health risks to a commercial worker if their duties required them to work in a future basement scenario. The risk from the enclosed space vapor inhalation pathway was found to be minimal. Risks posed by volatilized contamination emitted directly from the ground surface will be less than for an enclosed space.

There are no restrictions prohibiting USFWS from constructing buildings appropriate for the Refuge; however, it has been agreed that the Army or USFWS will perform an evaluation of risks prior to construction of any basements on post, as documented in the Final *IRMAICP*. The Army agreed to this additional restriction so that potential concerns related to a basement vapor exposure could be definitively resolved if, and when, a specific location was being considered for construction of a basement structure.

For lands that are transferred out of Federal ownership, i.e., the previously deleted WTP, Section 5 (d) of the *Refuge Act* mandates perpetual restrictions be attached to deeds. These restrictions include prohibitions on use of the property for industrial or residential purposes.

Odor Monitoring

(11a) It was the SSAB's understanding that the RMA is the only site where odor monitoring is used, at least within the State of Colorado, and had not encountered the technique at some of the most complex military sites in the country.

EPA Response: Monitoring of odors at the RMA is conducted in order to protect the public from, and minimize, nuisance odors. The *ROD* identifies Colorado Regulation No. 2 (5 CCR 1001-4) as an Applicable or Relevant and Appropriate Requirement (ARAR) and indicates that nuisance odors will be minimized. Colorado Regulation No. 2 is a regulation applicable to any work within the State of Colorado, not just to the RMA/NPL site. Any other work site throughout the State, whether it is being conducted under CERCLA or not, would be required to adhere to and be in compliance with this regulation. Colorado Regulation No. 2 is based on odor monitoring conducted with a scentometer that allows dilution of the odor to a threshold level so that a dilutions/ thresholds value, the criteria in the regulation, can be determined. The State of Colorado requires certifications for those people that monitor and evaluate odors with respect to the Regulation No. 2 criteria.

At RMA, air quality must adhere with Colorado Regulation No. 2 at the fenceline, and scentometer-based measurements are collected under certain conditions and action levels. Interior to RMA, a more practical method of odor monitoring is conducted using the n-butanol scale, where the strength of odors are estimated relative to n-butanol standards. This method of odor measurement is an American Society of Testing and Materials (ASTM) method, ASTM Method E-544-75. The method is based on scientific principles of odor intensity and uses well established and industry accepted methods to ensure the public is protected from nuisance odors. Therefore, the odor monitoring conducted at RMA is based on both a regulatory requirement (Colorado Regulation No. 2) and a proactive method (n-butanol intensity).

(11b) The SSAB expressed a concern that the use of odor monitoring increases the likelihood of public exposure to air emissions. The SSAB expressed a concern that site plans indicate a tendency to use odor monitoring as a substitute for more frequent air sample collection and analysis.

EPA Response: EPA is unaware of site plans where odor monitoring is used as a surrogate for air sample collection and analysis. As the SSAB pointed out in their comment, a dependable correlation between detection of volatile compounds through odor monitoring compared to actual lab-analyzed chemical concentrations does not exist. Some compounds have a health-based risk level corresponding to concentrations greater than the odor threshold, while other compounds have health-based concentrations less than the odor threshold. Odor monitoring does not, and has not, replaced or substituted for chemical emission air monitoring at RMA. Since 1999, the air program at RMA has included a formal dual-pronged approach to protection of human health and the environment, including protection from nuisance odors. The requirements of the air program are captured in the *Site-Wide Odor Monitoring Program Plan* that addresses odors, odor control actions, and odor monitoring and the *SWAQMP* that addresses chemical emissions, emission control actions, and air emission monitoring.

Long-term air monitoring has been conducted at RMA since 1987 with the inception of the Comprehensive Monitoring Program (CMP). The objectives of the CMP included collection of baseline data as part of the RI conducted at RMA and evaluation of potential air quality health hazards. Fenceline air monitoring was also conducted during the Basin F Interim Response Action (IRA) in 1988 and 1989. In 1991, the CMP and Basin F IRA programs were combined into the Comprehensive Air Quality and Meteorological Monitoring Program, which was the guiding program until the *SWAQMP* was put into place in 1999.

The current *SWAQMP* requires monitoring at the fenceline and visitor locations for the contaminants of concern (COCs), including total suspended particulate (TSP), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), organochlorine pesticides (OCPs), metals, and mercury. The frequency of monitoring is either every 3rd day, every 6th day, or every 12th day, depending on the remedial activities occurring at any given time and their predicted emissions. Besides site-wide programs, the air program at RMA includes project-specific chemical emission monitoring for those implementation projects where air modeling results indicate that additional monitoring and/or controls are warranted. These project-specific, air-related requirements are in addition to the normal site-wide requirements. Project-specific air and odor-related requirements are anticipated for the remaining projects at which contaminated soil will be disturbed and will not be curtailed because of deletion of the Internal Parcel.

Furthermore, consideration of air emissions is required during the design of implementation projects, and the final designs are often partly the result of including methods and controls designed to ensure that the project will not emit COCs above health-based action levels. EPA also conducts a collocated air monitoring program that is designed to evaluate the reproducibility of the Army's results. To date, this collocated program has indicated that the Army's results are reproducible with the exception of particulate matter less than 10 microns in diameter (PM-10), which was overestimated. TSP is now used as a surrogate for PM-10. In summary, the air program at RMA, as a separate and independent program, is sufficiently comprehensive and conservative to be protective of human health.

Buffer Zone

(12) The SSAB expressed an interest in how the buffer zone was determined around areas that have remedial activities remaining to be completed, and that about the Internal Parcel, because of a concern with potential risk of exposure to air emissions.

EPA Response: The remedial action projects remaining to be completed that involve disturbance of contaminated soil are primarily located interior to the RMA Central Remediation Area (CRA). There is a greater than 50-foot buffer between these project boundaries and the Internal Parcel boundary, in some cases up to one-half mile. Projects outside of the CRA have lower levels of contamination with associated lower risks; therefore, the 50-foot buffer was not based on risk posed by chemical air emissions. Instead, the 50-foot buffer was established for the non-CRA projects based on the need for remedial action support, including truck access/turnaround considerations, and haul roads with associated potential spills.

Once the excavation of Sand Creek Lateral is completed (expected by July 28, 2006), the areas of the Refuge currently open to visitation are located no closer than approximately one mile from the two remaining major project areas that involve disturbance of contaminated soil; approximately two miles from the Basin F projects and one mile from the Lime Basin slurry wall project. Currently, the USFWS visitor program allows visitors to enter the Refuge only through the south gate and follow a designated road to the Visitor Center. This route is clearly marked by gates which bar entry to adjacent roads. Once at the Visitor Center, participants attend formal programs led by USFWS staff and volunteers or use the hiking paths along and south of Lake Mary and Lake Ladora. The current *Public Use Plan* (2004) prohibits public access in areas north of the Visitor Center and Lakes area. USFWS staff and volunteers patrol the entry road, hiking paths and other program areas to ensure visitors do not stray away from allowed visitor areas. This management approach to allow restricted access for visitors will not change as a result of deletion. Any future revisions to the *Public Use Plan* (2004) will be subject

to public review. The *Memorandum of Understanding* (2005) restricting access to the northwest part of the Internal Parcel was developed as an additional precautionary measure.

Air emissions are measured at the current fenceline and near the Visitor Center to verify that potential risks to visitors and the nearby communities are minimized. These requirements to control air emissions within the levels specified by the *SWAQMP* remain in place irrespective of the deletion of the Internal Parcel and are designed to be protective of human health. Air emissions and the *SWAQMP* are discussed in greater detail in Comment 11.

Institutional Controls

(13a) The SSAB thought it was unfair to comment on a major deletion for property surrounding the areas of major contamination prior to having a final plan for ICs.

EPA Response: RMA currently has a final, approved IC plan that is tailored to meet the *ROD* and site-specific requirements for the interim period when the last remedial activities are on-going and before completion of the overall project remedy is achieved. This plan is the Final *IRMAICP* (2006). The Final *IRMAICP* applies to all federal lands and facilities within the boundaries of the RMA and the Refuge, including the Internal Parcel. The Final *IRMAICP* guides the ICs for the RMA until all surface remedial activities have been completed and the Preliminary Close-out Report approved. At that time, a Final Institutional Control Plan will be written that identifies controls applicable to the RMA and the Refuge after all remedial activities have been completed.

Institutional controls are administrative and/or legal controls to minimize the potential for human exposure to contamination and/or protect the integrity of the remedy whenever a site cannot support unlimited use and unrestricted exposure. The existence of ICs does not in itself render a response action incomplete. However, ICs applicable to a site must

be in place before response actions can be considered complete (*Close-Out Procedures for National Priorities List Sites* (OSWER Directive 9320.2-09A-P, 2000)). The Final *IRMAICP* identifies the ICs applicable to all areas of RMA, including the Internal Parcel. Because ICs are in place, the response actions can be considered complete with respect to the *NCP* criteria.

(13b) The SSAB wondered how the public is supposed to comment on the adequacy of public protection for property to be deleted that is directly adjacent to large areas of contamination that will not have remedies in place nor have associated ICs for several years to come.

EPA Response: The deletion process focuses on the media being deleted from the NPL, not on the media, or the contamination, that remains on the NPL. This criteria, as stated in the CFR at 40 CFR 300.425(e), provides for sites to be deleted from the NPL where no further response is required to protect public health or the environment.

The presence of large areas of contamination adjacent to a site proposed for deletion is not a criteria identified by the *NCP* for site deletion. Nevertheless, the Final *IRMAICP* includes ICs applicable to areas within the Internal Parcel due to the proximity of areas of contamination. For example, within the Internal Parcel, refuge visitor access is not allowed within the area surrounding Basin F while the project is ongoing. In addition, the Final *IRMAICP* includes ICs for areas remaining on the NPL where remedial activities are not yet complete. For example, the Final *IRMAICP* identifies ICs applicable to the cover areas even though these covers are not yet constructed. The final ICs required once the remedy is complete may actually be less restrictive than the interim ICs. For example, the buffer area around the Basin F area will no longer be required.

(13c) In addition, the SSAB stated that once deletion occurs, ICs are the only mechanism through which public safety and protection of the environment is controlled.

EPA Response: Institutional controls are controls to minimize the potential for human exposure to contamination and/or protect the integrity of the remedy whenever a site cannot support unlimited use and unrestricted exposure. However, the remedy as prescribed by the *ROD* is designed to be protective of human health and the environment. As indicated in 40 CFR 300.430 (a)(1)(iii)(D), while ICs should be used to supplement engineering controls or even constitute a part of the remedy, “the use of institutional controls shall not substitute for active response measures (e.g., treatment and/or containment of source material, restoration of ground waters to their beneficial uses) as the sole remedy unless such active measures are determined not to be practicable....” At the RMA, for example, ICs exist to prohibit the ingestion of groundwater, but that does not eliminate the requirement for the remedy to meet ARARs, such as Containment System Remediation Goals, at the boundaries of the RMA/NPL site.

At RMA, ICs supplement engineering controls, such as fences, locked gates, and extensive cap and cover systems. Even in the absence of ICs the potential for human exposure to contaminants at RMA is very low with the engineering controls that are in place.

The most stringent ICs at RMA were developed as part of federal law and court orders. The Interim and Final Institutional Control Plans for RMA are developed as operational plans that synthesize the requirements of the *FFA*, the *Refuge Act*, and other mandates, that the Army and USFWS use to implement and enforce those IC requirements.

Prohibition on Excavation

(14) The SSAB wondered how the USFWS will make sure that their own personnel as well as public visitors do not dig in the Internal Parcel in spite of the restrictions on the construction and use of basements and excavation into a site

containing pesticide contamination. It was unclear to the SSAB whether there are certain controls or outright prohibitions on these activities.

EPA Response: There are no prohibitions on USFWS digging or excavating for refuge management purposes on deleted and transferred lands. In the normal course of refuge operations, USFWS is required to locate utility lines, consider cultural resources, and follow other standard procedures before excavating. The Final *IRMAICP* identifies areas of residual soil contamination on deleted lands. Those areas are posted and USFWS personnel are trained on the locations and restrictions applicable to those sites.

Any type of digging or excavating by the public, without a Special Use Permit, is prohibited on all National Wildlife Refuges and constitutes a criminal violation of the National Wildlife Refuge Administration Act. This federal law is enforced by USFWS law enforcement officers. With more than 400,000 visitors in the past 17 years, there have been no cases of refuge visitors digging in the ground on RMA.

Basements are not prohibited at RMA, but they cannot be built or used unless additional studies are conducted and additional data is analyzed. The Final *IRMAICP* (2006) states:

...[t]he Army and the USFWS will neither build, use, nor allow the use of any basements at RMA unless the Army or the USFWS prepares a feasibility study that addresses the impacts of the use of basements on human health and the environment, and substantiates that such impacts are minimal.

Enforcement of Institutional Controls

(15) The SSAB expressed a concern that almost every section proposed for deletion had a portion excluded from the Internal Parcel, and given those exclusions, how access and land-use controls will be enforced.

EPA Response: Site-wide access and land-use controls are described in the Final *IRMAICP* and summarized in Section 7.4 of the *Technical Memorandum*. These controls include *ROD* and *FFA* prohibitions on residential development, use of groundwater and

surface water as potable water, consumption of fish and game, agricultural activities, and major hydrogeological alterations with the exception for Response Actions. Additional controls prohibit the use and construction of basements unless a FS is performed, control access to remediation areas by limiting access gates and maintaining perimeter fencing, control access in accordance with SafeRAC (Safe RMA Access and Control) procedures, maintain signs, prevent excavation into a site containing pesticide contamination, maintain water levels in Lower Derby Lake to minimize potential human exposure, manage access around Basin F Wastepile, protect engineered and groundwater remedial action structures, and maintain lake levels to support aquatic ecosystems.

Enforcement of controls is made easier at RMA by the use of engineering controls, including fences and locked gates. General access to RMA is controlled by the Army through Gate Security Procedures and Activity Coordination Permits (*IRMAICP* 2006). All activities at RMA, including public use and implementation projects, are submitted to the Army's SafeRAC computerized activity coordination program. The SafeRAC program is a computerized database used to coordinate all activities site wide. All entities conducting activities on the RMA are required to enter each of their activities in the program including type of activity, location, date, time, and a point of contact. This program ensures that conflicting activities do not occur and all activities on-site are coordinated safely.

Violations of ICs by on-site workers are handled through various enforcement mechanisms that are proportional to the violation, as generally described in the Final *IRMAICP* (2006). Minor and inadvertent violations of laws, regulations, policies, and procedures governing access and activities at the site may be handled administratively through management actions by the parent or sponsoring organization(s) at RMA and may include various forms of disciplinary action. As warranted, the response to these violations can escalate to include more severe penalties such as termination of contract, barring future entry to RMA, or termination of employment. More serious or repeated violations may result in prosecution.

The USFWS' *Public Use Plan* (2004) discusses law enforcement at the Refuge more specifically. USFWS law enforcement personnel report to the Supervisory Refuge Operations Specialist who ensures that all duty positions are covered and that public use facilities are maintained in a safe and operational condition. The Supervisory Refuge Operations Specialist coordinates with Central Dispatch, Adams County Sheriff, the Army Remedy Execution, and the Supervisory Park Ranger; and maintains routine contact with project managers and Health and Safety personnel regarding remedy work that may affect public use programs. USFWS law enforcement officers patrol the Refuge during public use programs to respond to emergencies, enforce laws, apprehend and cite violators, provide public information, and provide protection for the public, wildlife, and private and government property on the Refuge. In addition, staff members are briefed weekly on restricted access areas. All USFWS field personnel carry radios that link them to the Army and USFWS law enforcement networks to facilitate requests for assistance during routine operations.

Since 1989, there have been over 400,000 public visits to RMA, without inadvertent wandering of visitors into restricted areas. USFWS and the Army have effectively controlled visitors and unauthorized personnel from entering the area covered by the 2005 *Memorandum of Understanding* (described in Comment 2 along with the visitation program) since the cleanup began in 1996 - prior to the *Memorandum of Understanding* being developed. Site-wide there have been a handful of access control violations at RMA that involved trespass, which were dealt with appropriately. As the land management agencies, the Army and USFWS are responsible for ensuring the access and land-use control requirements in the Final *IRMAICP* are effectively enforced.

Operation and Maintenance (O&M)

(16) The SSAB queried what mechanisms/processes are in place to address O&M issues in deleted areas.

EPA Response: Only the groundwater part of the remedy requires O&M in the Internal Parcel because there are no caps, covers, or landfills. The Final *IRMAICP* (2006) indicates that the groundwater pump and treat systems will remain under Army jurisdiction as long as they are in operation. These systems each have their own O&M Manual covering trouble-shooting and corrective actions.

The *Long-Term Monitoring Plan for Groundwater (LTMP)* (1999) describes the groundwater monitoring program at RMA. The *Rocky Mountain Arsenal Ground-water Sampling and Analysis Plan (GWSAP)* (2003) outlines the well inspection and sampling procedures for groundwater monitoring at RMA. The *Well Retention and Closure Program [Plan] for RMA (WRCP)* (2003) serves as a companion document to the *LTMP* and identifies the criteria for retaining and closing wells on post and off post. The acts of deletion and transfer of property and/or groundwater do not remove wells from the *LTMP*. The wells at which the groundwater quality or levels are to be monitored at least annually are identified in the *LTMP*. The *GWSAP* and the *WRCP* instruct field personnel that conduct this monitoring to note the condition of the wells. This would be done for those wells located in the Internal Parcel as well as those remaining on the NPL site. The *WRCP* also identifies a decision and reporting process for damaged wells. This process requires notification to the Regulatory Agencies within a two-week timeframe depending upon the well category of damage to an *LTMP* well, and stipulates that decisions on repairing/replacing the well will be made within 90 days. Although the FYR is not linked to deletion, EPA comments on the FYRR indicated that the timely notification and decision making with respect to damaged wells has not always been conducted in accordance with the *WRCP* during the FYR period. It is anticipated that issues identified in the FYRR with respect to well maintenance will be addressed as part of the process to update the *LTMP*, which is scheduled to occur in the fall of 2006. Furthermore, because this issue has been brought to the Army's attention, EPA expects that timely notification and decision making with respect to damaged wells will occur prior to the update of the *LTMP*.

Adequacy of Characterization

(17a) The SSAB expressed a concern about the level of characterization conducted in the property proposed for deletion.

EPA Response: As with many CERCLA sites, limited historical information exists documenting the manufacturing and waste disposal practices at RMA. Therefore, one of the critical steps in the CERCLA process is to compile and review all available information regarding site activities and characteristics. EPA guidance states that potential contaminant “sources can be delineated and characterized through visual inspection during site reconnaissance; interviews with facility representatives, employees, or neighbors; and file searches (especially those at the facility itself) for disposal records, waste manifests, and waste sampling data” (*Guidance for Performing Preliminary Assessments Under CERCLA*: Publication 9345.0.01A, 1991). As part of the investigation activities for the Internal Parcel, file searches, “desktop” information (e.g., aerial photographs) searches, and site reconnaissance were conducted. All portions of the Internal Parcel were investigated.

The review of available historical information and RI soil sampling identified twelve soil projects requiring remediation. As the designs were developed and additional information obtained, the boundaries of the soil projects were refined. Additional areas were added to some designs to address recently identified ecological-risk soils resulting from design-refinements required by the *ROD*. Discovery of trash or debris, or visual staining during excavation, required remedy boundaries to be expanded until all trash, debris, or staining were removed.

As described in the *Technical Memorandum*, ten studies were performed that are relevant to the deletion of the Internal Parcel since the signing of the *ROD* on June 11, 1996.

These include: 1) the *Summary and Evaluation of Potential Ordnance/Explosives and Recovered Chemical Warfare Materiel Hazards at the Rocky Mountain Arsenal (OE/RCWM Evaluation Report)* (2002), 2) *Characterization of Dioxin Concentrations in Surface Soils at RMA* (2001), 3) *Assessment of Residual Ecological Risk and Risk Management Recommendations at the RMA, Part I: Terrestrial Pathways and Receptors* (2002), 4) *Assessment of Residual Ecological Risk and Risk Management*

Recommendations at the RMA, Part II: Aquatic Pathways and Receptors (2003), 5) *Final Surface Munitions Debris Inspection Report* (2003), 6) *Final Report, Geophysical Screening Activities and Results* (1998), 7) *DIMP Investigation* (2002), 8) *Unbackfilled HHE Characterization* (2002), 9) *Former Chemical Sewer Section 26 and 35 Data Review and Summary Report* (2000), and 10) *Secondary Basins Soil Remediation Project and Section 35 Soil Remediation Project*. These studies were conducted specifically to assess if additional remedial activities were needed for any area on the RMA/NPL Site, not just those being considered for partial deletion or transfer. The ten studies are representative of the ongoing efforts to ensure that cleanup of the RMA/NPL Site is comprehensive and conducted appropriately.

(17b) The SSAB expressed a particular concern with respect to characterization of the ordnance areas.

EPA Response: Burn pits and ordnance disposal areas at RMA have been characterized or sampled during the RI, remedial design, and remedial construction phases. During the RI, soil samples were collected from burn pits and ordnance disposal areas to characterize the nature and extent of contamination, and metals were identified as potential COCs for these areas. Although explosives were not included in the target analyte list for the RI, these organic compounds would have been identified during the Phase I RI through the gas chromatograph/mass spectrometry (GC/MS) screens if present in samples. No explosive compounds were identified through this process.

The *ROD* acknowledges the potential for metals contamination at ordnance disposal areas and requires removing soil with concentrations of contaminants exceeding the Toxicity Characteristic Leaching Procedure (TCLP) regulatory levels. During the remedial design for the Burial Trenches/Munitions Testing projects, soil at munitions debris areas was sampled and analyzed for arsenic, heavy metals, and mercury. Results of the analyses showed that none of the soil associated with the munitions debris exceeded TCLP regulatory levels, indicating that despite the presence of metallic debris, there was no contamination leaching to the environment that required remediation.

In addition, the issue of explosive residue in soil was considered during the design of the Burial Trenches/Munitions Testing projects. The *Burial Trenches and Munitions (Testing) Soil Remediation Project 100 Percent Design Package* (2000) states:

Explosive residue in soil or water typically has been attributed to demilitarization operations involving high-pressure washing of high explosives (HE) from munitions and the subsequent disposal of residual wastewater in unlined settling basins. No such operations have ever been conducted at these RMA sites. Instead, HE munitions were demilitarized by controlled detonation or incineration.

Environmental degradation rates (half-lives) established for 6 of the chemicals associated with explosive residue are all 7 months or less in soil and 13 months or less in groundwater. Since none of the project sites have been active disposal areas for at least 14 years, and most have been inactive for at least 25 years, any explosive residue that might have been deposited would have been degraded by now and no longer poses a risk.

Based on the opinion of Army ordnance experts expressed in this memorandum, explosive residue is not a remediation issue.

The excavation of the burn pits was "performance-based", i.e., all HHE ROD-identified soil was excavated, and, in addition, the excavation continued until all debris and discolored, stained, or charred soil was removed. The removal of all the visibly impacted soil in the burn pits and burial trenches is consistent with EPA guidance, which states that potential contaminant "sources can be delineated and characterized through visual inspection during site reconnaissance; interviews with facility representatives, employees, or neighbors; and file searches (especially those at the facility itself) for disposal records, waste manifests, and waste sampling data" (*Guidance for Performing Preliminary Assessments Under CERCLA*: Publication 9345.0.01A, 1991). Following the performance-based excavations, confirmatory samples were collected at many of the sites. As discussed in Section 6 of the Technical Memorandum, one site partially within and one site completely within the Internal Parcel were remediated by the Munitions Testing Soil Remediation Project. The *Munitions Testing Soil Remediation Project, Construction Completion Report, Part I* (2002) indicates that confirmatory soil samples were collected from both of these sites and analyzed for cadmium, chromium, and lead, which were identified to be the COCs for this site. The results at both sites were below

HHE criteria. Section 6 of the *Technical Memorandum* also discusses remediation of the sites within the Burial Trenches Soil Remediation Project. Within the Internal Parcel and for the combined parts of this project, the sites remediated by this project included: eight burn pits, two surface burn areas, seven debris areas, and one munitions debris stockpile. Thirty-five confirmatory soil samples were collected from the burn pits and analyzed for cadmium, chromium, and lead, which were identified to be the COCs for this site. The results were all below HHE criteria. Confirmatory samples were collected based on the most likely locations thought to have contamination, such as immediately below the burn pit and in areas remaining after removal of charred or stained soil and dense debris.

A complete description of all burn pits and ordnance disposal areas remediated within the Internal Parcel is summarized in the *Technical Memorandum*. Additional detail is provided in the *Munitions Testing Soil Remediation Project, Construction Completion Report, Part I* (2002), *Burial Trenches Soil Remediation Project, Construction Completion Report, Part I* (2003), and *Burial Trenches Soil Remediation Project, Construction Completion Report, Part II* (2004).

(17c) The SSAB also expressed a concern with characterization of the groundwater deleted east of E street, particularly with respect to whether the groundwater has been evaluated and monitored for explosive compounds and explosive-degradation compounds.

EPA Response: Sections 19, 20, 29, and 30 of the RMA were characterized during the RI. Explosives and explosive-degradation products were eliminated as candidates for the RMA target analyte list based on the absence of detections in GC/MS screens during the Phase I RI. Wells in Sections 19, 20, 29, and 30 are included in the water-level monitoring network, but water quality monitoring was not included in the long-term monitoring program for this area based on historical monitoring data.

As described above, the *ROD* remedy for munitions testing and burial trenches includes the removal of MEC, munitions debris, and soils associated with munitions debris that fail TCLP. Explosive residue and TCLP metals were addressed during pre-design studies for the Burial Trenches and Munitions (Testing) Soil Remediation Project and are summarized in the *Burial Trenches and Munitions (Testing) Soil Remediation Project 100 Percent Design Package* (2000). These studies showed that explosive residue and TCLP-metal concentrations were below risk-based regulatory levels. Considering these studies, the geology of the area, as well as the history of the disposal areas, there is no evidence of explosive or TCLP-metal soil contamination that could act as a source of groundwater contamination. The history of munitions at RMA is summarized in the *OE/RCWM Evaluation Report* (2002).

(17d) The SSAB also requested a list of Internal Parcel Area sites that were either missed or thought to have been remediated and only later found to contain additional contamination.

EPA Response: EPA is not aware of any sites in the Internal Parcel that were not identified by the *ROD*, but subsequently found to contain contamination. In addition, only one site in the Internal Parcel, SAR Site NCSA-8b, may be considered to have been remediated and later found to contain additional contamination. Other areas, such as the Sand Creek Lateral, are not within the Internal Parcel. The discovery of additional contamination at the Sand Creek Lateral is discussed in Section D of this Responsiveness Summary.

Section 6.3.6 of the *Technical Memorandum* discusses SAR Site NCSA-8b. This site was identified for sampling to assess ecological risk because the site was not backfilled after excavation of the HHE soil. The results of the additional sampling to assess ecological risk identified additional HHE soil. Through the process of confirmatory sampling, an additional 11,133 bank cubic yards (bcy) of Contingent Soil Volume (CSV) was excavated and transported to the HWL.

It is noted that during the original remediation activities, sixteen confirmatory samples had been collected after excavation of the design HHE soil volume, and 387 bcy of CSV were identified, excavated, and hauled to the HWL. Confirmatory sampling had been continued until the contaminant concentrations were below HHE levels.

While unexpected, the discovery of additional contamination at SAR Site NCSA-8b subsequent to the original remedial action and collection of confirmatory samples demonstrates the multiple, sometimes overlapping, elements of the selected remedy in the *ROD* that protect human health and the environment. These elements include excavation of known contaminated HHE soil, excavation of Biota soil, further evaluation of ecological risks, backfill of HHE excavation areas, and provisions for the collection of confirmatory samples and the identification of CSV.

(17e) The SSAB also queried the adequacy of characterization in the Internal Parcel within Section 35 because of the discovery of additional contamination on the banks of the Sand Creek Lateral.

EPA Response: The history of discovery of previously unidentified contamination along the Sand Creek Lateral is discussed in Comment 22. This discovery and subsequent characterization resulted in the conclusion that the contamination along the banks of the Lateral (and one other ditch) was due to ditch maintenance activities, which included removal of sediment from the ditch, deposition along the ditch banks, and subsequent grading or disturbance of the deposited spoils. These activities were limited to the immediate area of the Lateral (and one other ditch); therefore, the remainder of the section is retained within the Internal Parcel.

Transfer of Property

(18) The SSAB questioned whether the proposed plan to transfer property where the treatment systems are located is appropriate given the *Refuge Act*. If that was

allowed, the SSAB also wondered what would prevent the Army from transferring all land to USFWS, including the areas of the landfills and caps.

EPA Response: The SSAB has correctly stated that the Army cannot transfer certain properties and facilities, including water treatment facilities. The 1992 *Refuge Act*, Section 2 (c)(1) states:

Property used for environmental cleanup purposes. The Secretary of the Army shall retain jurisdiction, authority, and control over all real property at the Arsenal to be used for water treatment; the treatment, storage, or disposal of hazardous substances, pollutants, or contaminants; or other purposes related to response action at the Arsenal and . . .

As required by Section 2(c) of the *Refuge Act*, the Army cannot transfer landfills and capped areas, which are used for “the treatment, storage, or disposal of hazardous substances, pollutants, or contaminants.” There are no such areas in the proposed Internal Parcel.

Restrictions on Additional Investigations

(19) The SSAB questioned whether this deletion could conceivably impact the ability of the EPA or State of Colorado to conduct additional investigations in the deleted area, if future information warrants such action.

EPA Response: EPA's authority to address threats to human health and the environment is contained in Sections 104 and 106 of CERCLA. These sections of the law apply to any actual or threatened release, irrespective of whether the release is listed on the NPL. These EPA authorities will continue to apply to deleted property. In addition, 40 CFR 300.430(e)(3) provides for a site to be restored to the NPL, without further application of the hazard ranking system, if there is a significant release from a deleted site. EPA has ample authority to address any future threats to human health or the environment that may arise from releases on deleted property.

Signs

(20) Two commenters thought that signs would be inadequate to keep people out of contaminated or restricted areas and fences or other barriers should be used to restrict access.

EPA Response: The restrictions to visitor access on the Refuge are summarized in EPA's Response to Comment 2, but are repeated here. Currently, the USFWS visitor program allows visitors to enter the Refuge only through the south gate and follow a designated road to the Visitor Center. This route is clearly marked by gates which bar entry to adjacent roads. Once at the Visitor Center, participants attend formal programs led by USFWS staff and volunteers or use the hiking paths along and south of Lake Mary and Lake Ladora. The current USFWS *Public Use Plan* (2004) prohibits public access in areas north of the Visitor Center and Lakes area. USFWS staff and volunteers patrol the entry road, hiking paths and other program areas to ensure visitors do not stray away from allowed visitor areas. This management approach to allow restricted access for visitors will not change as a result of deletion. Any future revisions to the *Public Use Plan* (2004) will be subject to public review. The *Memorandum of Understanding* (2005) restricting access to the northwest part of the Internal Parcel was developed as an additional precautionary measure.

The restrictions in place, including signs, are reasonable measures to prevent inadvertent trespass given the controlled program under which visitation is conducted. Additional barriers or fences, unless extremely formidable, would likely be insufficient to prevent willful trespass by individuals into restricted areas.

With respect to the remaining restricted areas on the NPL site, visitor access is controlled in accordance with RMA's SafeRAC procedures. Health and safety policies require setting exclusion zones surrounding the areas of active remedial action that involve excavation and disposal of human-health risk soil. These exclusion zones are designated with caution barrier tape that would require stepping over or under in order for a person to willfully trespass into a site. Further, health and safety oversight practices actively and

continually assess who is on the NPL project sites. Trespass into a site by an unescorted or unapproved individual would be noticed and corrected.

Alteration of Groundwater Flow

(21) The Sierra Club disagreed with the proposal to delete areas of groundwater under RMA. The Sierra Club did not believe that the groundwater proposed for deletion in the Internal Parcel has been properly modeled or evaluated, and that deletion could allow aquifer extraction that could alter groundwater flow to the boundary treatment facilities.

EPA Response: The RMA groundwater remedy was selected based on an evaluation of flow and chemical data that included flow modeling. Any groundwater extraction within the deletion areas would be for limited, intermittent refuge use and too low in volume to have any impact on the flow to the boundary treatment systems. The existing extraction wells in the eastern portion of the RMA are low volume agricultural wells. Extraction of groundwater within the Internal Parcel is, and would be, required to be consistent with the remedy, which requires containment of the contaminated groundwater plumes at the RMA boundary. Section 2(a)(2) of the *Refuge Act* (1992) states:

The management of the property by the Secretary of the Interior shall be subject to (A) any response action at the Arsenal carried out by or under the authority of the Secretary of the Army under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq.) and other applicable provisions of law, ...

In addition, any new groundwater wells would be subject to stringent controls by the Colorado Water Courts and the State Engineers Office to ensure that existing streamflows and existing groundwater uses are not impacted. Groundwater monitoring wells within the Internal Parcel are identified in the *LTMP*. The Army will continue to conduct water level monitoring in these wells to assess any changes in flow directions.

**D: ADDITIONAL COMMENTS AND QUESTIONS RECEIVED
REGARDING THE RMA/NPL SITE**

Sand Creek Lateral

(22) The SSAB expressed concerns that additional contamination was discovered at the SCL and Basin B Drainage Ditch and that this contamination adds uncertainty to the characterization of the area.

EPA Response: The history regarding the discovery of additional contamination at the Sand Creek Lateral is contained in the *Miscellaneous Southern Tier Soils Remediation Project, Sand Creek Lateral, Additional Human Health Exceedance Delineation, Final, Sampling and Analysis Plan* (TTFWI 2005). This history states:

In October 2004, composite surface soil sampling was conducted in Terrestrial Residual Ecological Risk (TRER) Site 2NW-4, located within Section 2 of the RMA site. The purpose of this sampling was to demonstrate that the Biological Advisory Subcommittee (BAS) approved 3-step tilling process would reduce the Hazard Quotient (HQ) to 2 or less, in areas where estimated HQs were believed to be between 2 and 10. Post-tilling sampling was required to demonstrate the risk reduction.

The sampling was conducted in accordance with the Final Residual Risk Soil Concentration Verification SAP Soil Tilling Demonstration Study (TtFW 2004b), which was based on the Residual Risk Soil Concentration Verification SAP (USFWS 2000). TRER Site 2NW-4 was subdivided into six 3-acre parcels as required by the SAP. Five surficial subsamples were collected within each 3-acre parcel, and composited into one sample to represent the 3-acre parcel. Samples were analyzed on-post at the Environmental Analytical Laboratory (EAL) for low level aldrin and dieldrin.

Results of the analysis indicated acute and chronic Human Health Site Evaluation Criteria (HH SEC) exceedances in two of the six parcels in TRER site 2NW-4. In addition, two other parcels exhibited residual ecological risk that is considered unacceptable ($HQ > 2$). Additional sampling was conducted under the Contingent Soil Volume (CSV) SAP (RVO [Remediation Venture Office] 2003) in November 2004 for the purpose of providing data from discrete sample locations to delineate the HHE soils in TRER Site 2NW-4. A total of 36 discrete soils were collected from TRER Site 2NW-4. Results of this sampling event indicated that the highest concentrations of aldrin/dieldrin were located

immediately adjacent to the bank of the Sand Creek Lateral. . . . As sample locations moved outward in bands, concentrations correspondingly decreased from HHE levels, to biota levels, to non-detect.

Historic aerial photographs were reviewed to try and identify the activity which may have caused the bank contamination which had been overlooked in the prior remedy effort. Review of historic photos identified what appeared to be prior dredging activities along the SCL. It is hypothesized that these dredging operations were a maintenance action for the lateral, however, there are no written documentation of this action taking place. Subsequent aerial photographs indicate that after lateral material was dredged and deposited on the banks, the areas were graded. There is no record as to whether any of this dredged material was removed prior to grading or if all of it was graded along the lateral.

Photographs from 1954 and 1965 provided the most comprehensive evidence of dredging and grading activities and were used for sample location placement. Piles of what appear to be dredged material are visible along the banks of the lateral in the 1954 photograph, and grading of this material is evident in subsequent photographs, particularly one taken in 1965. These photographs were used to aid in the placement of sample points for Phase 1 of sampling. In order to have a higher likelihood of locating contamination, areas along the SCL that have already undergone remedy removal actions were not selected for sampling. Results from the phase 1 sampling event will provide data that will be used to identify additional sampling locations for final contamination delineation purposes. [Note that although this history does not discuss SAR Site NCSA-5b (Basin B Drainage Ditch), this ditch had similar history and NCSA-5b was included as part of the sampling program for the Sand Creek Lateral.]

The Remedial Investigation included several transects of the Sand Creek Lateral designed to assess the horizontal extent of contamination. The results are contained in the *Final, Phase II Data Addendum, Site 2-1, Drainage Ditches* (1988), *Final Phase II Data Addendum, Site 35-4: Drainage Ditches* (1988), and *Final Phase II Data Addendum, Section 35 – Nonsource Area* (1988). However, with the exception of a transect where the South Plants central tributary ditches discharged into the Sand Creek Lateral, the samples on the banks did not show evidence of HHE contamination.

Remediation of the original Sand Creek Lateral occurred in 1999. During remediation, over 100 confirmatory samples were collected from the ditch. These confirmatory samples were primarily located within the ditch, but samples were also collected from the banks of the Sand Creek Lateral in the vicinity of TRER Site 2NW-4. Several samples

exhibited concentrations of COCs in excess of HHE levels. CSV was excavated in response to these exceedances. Further confirmatory samples were collected and CSV excavated until the results of the soil samples were below exceedance levels. The locations of these confirmatory samples appeared to define the horizontal and vertical extent of contamination.

Without the benefit of the current aerial photographic library that was not nearly as complete at the time of the *ROD*, and in the absence of written documentation of dredging activities, the RI results did not provide evidence to suggest that the banks were contaminated. In addition, during the original remediation, confirmatory samples collected from the final excavated surface had concentrations less than exceedance levels, which provided no reason to believe that the banks of the Sand Creek Lateral were contaminated beyond what had been excavated as CSV.

As previously indicated, limited historical information exists documenting the manufacturing and waste disposal practices at RMA. CERCLA recognizes that the technical understanding of a site will continue to mature throughout the investigation(s) and during actual remediation. This is especially true at more complicated sites and sites with a multi-use or long operational history such as the RMA/NPL Site. EPA contemplated this when the *NCP* was promulgated, and required that the RI must "interact" with the FS, the risk assessment, and ARAR analysis so that a protective and legally appropriate remedy approach is selected. EPA also uses a phased response process (e.g., IRAs followed by the final remedy) and OUs to administer complex and dynamic sites. Further, provisions in the *NCP* for incorporating post-ROD modifications to a remedy is a practical acknowledgement that "in-the-field" design or cleanup activities are likely to yield new information for refining the selected remedy.

Based on the new understanding and conceptual site model by which contamination may have been distributed, a review of other ditches within the boundaries considered for deletion was conducted by the Army. An independent review of other ditches within the proposed Internal Parcel area was also conducted by EPA. These reviews identified one other ditch, ditch SSA-2a south of South Plants, as having the potential to have contamination along the banks based on RI sampling results and the appearance of dredging spoils in the aerial photographs. Accordingly, the SSA-2a ditch and banks were not included within the Internal Parcel area and a sampling program for the ditch and

banks is pending. In addition, EPA will be conducting a review of other ditches within the area that remains on the NPL.

Demolition Range Exclusion Zone (DREZ) Burn Pit

(23) The SSAB expressed concern with the characterization of a burn pit within the DREZ. In particular, they were concerned that the soil associated with the burn pit may not have been sampled for metals or explosives.

EPA Response: The "burn pit" is a 6-foot by 6-foot area within Section 29. The burn pit was approximately 3 feet in depth. The burn pit was identified through the geophysical survey and anomaly clearance activities being conducted at the DREZ. No MEC was found in the pit, although the pit did contain munitions debris related primarily to M69/M74 incendiary bombs.

The soil from the burn pit was sampled at depths of 0.5 feet, 1.5 feet, and 3.5 feet for SVOCs and VOCs. The SVOC suite by EPA Method 8270 included polynuclear aromatics, OCPs, explosive-related compounds, organophosphorous compounds, and organosulfur compounds. The explosive-related compounds included dinitrotoluene, nitrobenzene, and nitrophenols. Preliminary results were less than detection limits. It should be noted that although Solid Waste (SW)-846 Method 8270 identifies nitrotoluenes, nitrobenzene, and nitrophenols as compounds that can be determined by the method, the preferred method of analysis for explosives is by SW-846 Method 8330. Preliminary results of the VOC analyses were also less than detectable limits.

Although the Army did not sample this particular pit for metals, the clearance in this area is not yet complete. The *ROD* limitation is specific for *confirmatory* sampling and does not limit the number of *characterization* samples collected.

In addition, as discussed in the *Technical Memorandum*, results of over 35 confirmatory samples collected at burn and munitions debris areas within the Internal Parcel and analyzed for metals did not result in the identification of any HHE soil. As with all remediation areas, EPA will consider collection of confirmatory samples at this site prior to project completion.

ATTACHMENT A

**COMMUNITY INVOLVEMENT ACTIVITIES CONDUCTED AT THE
RMA/NPL SITE PERTINENT TO THE INTERNAL PARCEL**

**COMMUNITY INVOLVEMENT ACTIVITIES CONDUCTED FOR THE RMA/NPL SITE
PERTINENT TO THE INTERNAL PARCEL**

<u>Date(s)</u>	<u>Presentation or Documents Provided to the Public</u>
10-16-95 to 1-15-96	<ul style="list-style-type: none"> - Remedial Investigation Summary Report (1992) provided for public review and comment. - Integrated Endangerment Assessment/Risk Characterization (1994) provided for public review and comment. - Proposed Plan for the RMA On-Post Operable Unit (1995) Record of Decision provided for public review and comment.
9-15-99 to 10-13-99	<ul style="list-style-type: none"> - Burial Trenches and Munitions (Testing) Soil Remediation Project, 95 Percent Design Package (1999) provided for public review and comment.
11-4-2000 to 12-4-2000	<ul style="list-style-type: none"> - Denver Front Range Study, Dioxins in Surface Soil, Study 2: Characterization of Dioxins, furans, and PCBs in Random Soil Samples Collected from the Rocky Mountain Arsenal (2001) provided for public review and comment.
1-24-02 to 4-1-02	<ul style="list-style-type: none"> - Evaluation of Potential Ordnance/Explosives (OE) and Recovered Chemical Warfare Material (RCWM) Hazards (2002) provided for public review and comment.
9-10-04 to 10-8-04	<ul style="list-style-type: none"> - Public Use Plan (2004) provided for public review and comment.
11-10-05	<ul style="list-style-type: none"> - Presentation to Rocky Mountain Arsenal (RMA) Restoration Advisory Board (RAB) community group describing Internal Parcel area of RMA under consideration for potential deletion in 2006.
2-22-06	<ul style="list-style-type: none"> - Provided advance notice to RMA Site-Specific Advisory Board (SSAB) community group that Internal Parcel area of RMA was under consideration for potential deletion in 2006.
2-24-06 to 3-27-06	<ul style="list-style-type: none"> - Explanation of Significant Differences for Groundwater and Revegetation Requirements provided for public comment and review.
3-30-06	<ul style="list-style-type: none"> - Briefed RAB on the expected publication of the Notice of Intent to partially Delete (NOIDp) in the <i>Federal Register</i> for the Internal Parcel.
4-11-06	<ul style="list-style-type: none"> - Presentation to the SSAB on the expected publication of the NOIDp in the <i>Federal Register</i> for the Internal Parcel.

- 4-26-06
 - NOIDp for the Internal Parcel published in *Federal Register* (71 FR 24627), initiating a 30-day public comment period through 5-26-06.
 - Notice of Intent to Delete the Internal Parcel Fact Sheet is mailed to members of the RAB, SSAB, Agency stakeholders, elected officials, local media, environmental groups, and business associations.
 - Public notices announcing the NOIDp public comment period are published in the Rocky Mountain News, Commerce City Beacon, the Commerce City Gateway (4-28-06), and the Brighton Blade (5-3-06).
- 5-9-06
 - Public Comment meeting regarding the proposed Internal Parcel partial Deletion Action. The meeting included a presentation describing the Internal Parcel and how it met the deletion criteria. After clarifying questions had been addressed, an opportunity to make formal comment(s) regarding EPA's proposed partial deletion was provided.
- 5-11-06
 - Provided update to the RAB on the Proposed partial Deletion of the Internal Parcel including extension of the public comment period for 30 days.
- 5-24-06
 - Notice to Extend the Public Comment Period for the Proposed Deletion of the Internal Parcel to 6-26-06 is published in the *Federal Register* (71 FR 29880), Rocky Mountain News, Commerce City Beacon, Brighton Blade, and Commerce City Gateway (5-26-06).
- 4-26-06 to 6-26-06
 - Public comment period provided for the proposed partial deletion of Internal Parcel from the RMA Site.
 - Management Plan for Protection and Monitoring of Lake Ladora, Lake Mary, and Lower Derby Lake During RMA Remediation (2006) provided for public review and comment.
 - Final Interim RMA Institutional Control Plan (2006) provided for public review and comment.
 - Site-Wide Air Quality Monitoring Program Plan (2006) provided for public review and comment.
 - Summary of Munitions and Explosives of Concern Recovered on Rocky Mountain Arsenal During Remedy Execution (2006) provided for public comment and review.
 - Technical Memorandum in Support of the Partial Deletion of the Internal Parcel Deletion Area (2006) provided for public comment and review.

ATTACHMENT B

**WRITTEN COMMENT LETTERS RECEIVED REGARDING
PARTIAL DELETION OF THE INTERNAL PARCEL**

Technical Assistance Grant Comments

on the

Proposed National Priorities List Partial Deletion of the Internal Parcel

Prepared for the

Site Specific Advisory Board (SSAB) of the Rocky Mountain Arsenal, Inc.

Prepared by

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June 26, 2006**

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Comments on the Proposed National Priorities List Partial Deletion of the Internal Parcel

The Rocky Mountain Arsenal Site Specific Advisory Board (SSAB) requests that the proposed *National Priorities List Partial Deletion of the Internal Parcel* (hereinafter referred to as "Internal Parcel") be postponed for a period of 12 months. The SSAB and its technical advisor Henry & Associates, LLC, funded by a technical assistance grant (TAG) through Region 8 of the Environmental Protection Agency (EPA), believe this postponement is necessary because of technical and process-related concerns.

Specifically, the SSAB has identified several questions regarding the characterization of the eastern portion of the Internal Parcel, and unnecessary risk posed by the western portion of the proposed deletion. The requested postponement is necessary because time is needed to bring transparency and resolution to these questions. The time and information provided through the current public comment process is simply inadequate for such a large, major CERCLA step at the Rocky Mountain Arsenal (RMA).

The comments below outline the SSAB's concerns regarding the proposed deletion and the group's reasoning for requesting the postponement. The SSAB requests that the EPA consider these observations and concerns seriously. The SSAB requests that the EPA and other participating agencies carefully weigh the true benefits of providing more time, so the SSAB and other concerned residents can identify technical concerns and make informed assessments, versus the potential pitfalls of expediting the delisting in its current form.

Piece-meal Approach to Delisting

The SSAB is concerned that, in reality, almost every section proposed for deletion has a portion that had to be excluded from the Internal Parcel. This raises logical questions about a) whether the section is ready for delisting, and b) if the proposed delisting is accepted, how the enforcement of access and land-use will be controlled given all the exceptions. With regard to whether certain sections are ready for delisting, it is clear that a postponement would help address the flawed, *Swiss-cheese* nature of the proposed delisting. For instance, the ability to manage access and future risk would be improved if the additional contamination at Sand Creek Lateral could be remediated prior to the delisting. Additionally, the New Toxic Storage Yard in Section 31 was also found to contain a burn area and associated wastes that had not been found previously. This area was remediated, according to the Remediation Venture Office (RVO), but had to be excluded from the Internal Parcel because the documentation process has not yet been completed.

With regards to the enforcement of access and land-use controls, Section 35 and other sections within the northwest portion of the Internal Parcel present another concern, if this piece-meal deletion moves forward. Much of the land proposed for deletion is adjacent to ongoing or future clean-up activities, where moving or capping significant contamination has not yet been completed. This effort to delete portions of these sections now, increases the complexity of the Internal Parcel and the administrative requirements

to ensure worker and visitor safety. The fact that the parties needed to generate an Memorandum of Understanding to restrict access to these specific sections as a direct result of these sections being included in the Internal Parcel is a perfect example of the increased complexity and enforcement burden. This is a concern to the SSAB because logic dictates that risks to the public and environment increase as the manpower and costs required to enforce access and land-use controls increase.

The SSAB does not understand why the RVO would propose such a complicated de-listing, and why the regulatory agencies would support it, given the likelihood that this approach will increase the difficulty of land-use control and oversight. For the example sections provided, as well as other portions of the Internal Parcel, it would seem like everyone involved would benefit from waiting until these areas are fully ready to be de-listed. Whether one considers the CERCLA process, access and land-use control requirements, or the public's ability to participate and address concerns, it just seems illogical to have such *carve-outs* or exceptions distributed throughout the Internal Parcel.

Presentation of Proposed Action

The SSAB would like to point out several observations regarding the presentation of this proposed deletion that has made the process less transparent and made it more difficult for the SSAB to participate. First, the fact sheet and the *Technical Memorandum in Support of the Partial Deletion of the Internal Parcel Deletion Area, March 2006* (hereinafter referred to as the Tech Memo) discuss the northwest corner of Section 6, where groundwater contamination remains, that is not being included in the Internal Parcel. However, the map in the fact sheet does not show this excluded part, and even the larger maps in the Tech Memo make it difficult to discern. How are the SSAB and the public supposed to be able to assess important issues, such as the nature of contamination that required the exclusion in the northwest corner, how much cushion or boundary is being given to this exclusion area, and whether that buffer is adequate, without a blow-up map of the area in question and a specific discussion regarding the relevant data? In cases where finer dissection of a proposal is necessary, it is important that the supporting graphics and data are provided.

Another hurdle for participating in this process is the structure of the Tech Memo. Generally, the Tech Memo is written with the approach of summarizing the areas investigated and listing the steps taken. However, the public is far more interested in:

- a) sampling point locations within the various sections and sites,
- b) what types of data were collected,
- c) is there confirmation data that shows that the actions taken at specific sites were sufficient,
- d) have participating agencies considered what uncertainties do or may exist, and
- e) are we sure the potential exposure scenarios in the future have been evaluated based on what we know and the uncertainties identified.

Because the Tech Memo does not consider these key concerns, the document provides little comfort that the property is ready to be delisted and safe to enter the normal refuge management process conducted by FWS.

It is also worth noting that the structure of the document increases the difficulty to assess if the main tenet, that no further response is necessary to protect health and the environment, is supported by the project data. For instance, section 3.4 of the document summarizes the RI, EA and FS results for groundwater, structures and soil sites *by section* (1, 2, etc.). The fact that little data is actually shown or discussed is a significant hurdle for public review, particularly if it is expected within sixty days. Then, the presentation of the information is complicated farther by the shift in later chapters to site groupings and projects. For example, document section 6.3.1.2, Burial Trenches Soil Remediation Project Part 2, addresses the remediation of 5 sites from four different RMA land sections (6, 20, 32 and 35). The result is that the reader is presented with a given number of sites of potential concern for each specific section at the beginning of Tech Memo, and then the actions taken for those specific sites are based on a different classification scheme and, subsequently, distributed into various chapters, sections, and subsections in the rest of the document. The SSAB would like to know if anyone considered the structure and content of the document in relation to the CERCLA public involvement and acceptance requirements. Did anyone consider carrying the section-by-section focus throughout the document, so one could actually follow a given site from identification through remedy completion?

While it is acknowledged that RMA efforts over the last decade for the 11.5 square miles that have been proposed for deletion are enormous and very difficult to present in one coherent document, the SSAB believes it is vital that every reasonable effort be made to present the material in a fashion clear and useable, particularly for a major CERCLA step like deleting and de-listing 11.5 square miles. It cannot be overstated that the sole purpose of the Tech Memo appears to be to document and explain why the delisting is appropriate. While it may do this adequately for those who have worked on the project for many years, is that the standard that should be met? Should not the document be clear to those who have to live with the final product? Should it not provide enough detail for agencies representatives who have to assess risk a decade from now to be able to see the logic in the conclusions presented?

EPA Docket and Allocated Review Time

According to the EPA remedial project manager for RMA, the EPA docket for this proposed deletion consists of "key" documents that demonstrate the CERCLA process leading to, and including, the response actions for the Internal Parcel. By the SSAB's count, this docket consists of 139 *key* documents, noting that many of these documents are substantial in size and content. In turn, the 30-day comment period and the 30-day extension granted by the EPA just are not adequate for anyone within the public to provide comments regarding this significant milestone. At many sites across the country, the U.S. Army and EPA would provide a 30-day comment and an extension, if requested, for a document covering a single investigation or proposed action. This CERCLA step covers a decade worth of work and 11.5 square miles.

Compounding the public's hurdle to be able to participate in this commenting process is the availability of the reference documents listed in the Tech Memo. This tech memo is the main document behind the fact sheet announcing the proposed deletion and comment period, and summarizes all the work that has been conducted that justifies the proposed deletion at this time. There are over 170 references identified in this tech memo (Section 9), which is far more than those available through the EPA docket. It is possible that some of the documents referenced in the Tech Memo, but not included on the EPA docket, are presented within other documents that are available in the docket. However, it is certainly not clear through the TAG review, and it has been time consuming to try and figure it out, even with the helpful support of Laura Williams from the EPA and Susan Ulrich from the RVO. If there are others who are trying to wade through this information, it must be even a more daunting task for them to find answers to questions and concerns they have.

As a case in point, Henry & Associates identified approximately 40 documents during its review of the Tech Memo that needed to be reviewed to some degree. Most of these documents were selected for follow-up because they were referenced within specific paragraphs presenting an important issue or conclusion without key data being provided to support the discussion. Henry & Associates then conducted a cross-walk between the needed documents and the EPA docket in an effort to get the references needed. The result of this cross-walk revealed that less than half of the documents needed were actually available through the EPA's web site. This challenge to find the information needed within the Tech Memo and the referenced support documents significantly hampered the TAG review, and the SSAB's ability to determine which concerns could be put to rest and which ones require follow-up.

An example of the challenge outlined above can be found in Section 3 of the Tech Memo. In the surface water quality discussion in section 3.1.1, the text states, "Although sporadic detections occurred in First Creek (figure 1.0-1), an overall downstream decline in water quality was not observed." The next paragraph goes on to say that "a low frequency of contaminant detections is typical for surface water within RMA," but finishes by stating, "The RI concluded that surface water on RMA shows little impact from former contaminant releases (Ebasco 1989a)."

The challenges with conducting any type of review on the specific subsection are several. First, while the text presents the conclusion that there is no problem, the text does not mention anything about the types of compounds detected or the concentrations found in First Creek. The text does reference the reader to figure 1.0-1 to see First Creek, but, oddly, the portion of First Creek on RMA is not included on the map. In the second paragraph, surface water in the lakes is discussed and it does mention that inorganic analytes were detected and notes that such inorganics may reflect both natural and manmade influences. The text does not mention whether other contaminants were found in the lakes. Furthermore, the reference listed at the end of the paragraph, Ebasco 1989a, Water Remedial Investigation Report, does not appear to be available in the EPA docket, based on a cross-walk between the Tech Memo reference and the docket list printout.

Section 3.1.3 is another example where key data was not presented in the Tech Memo and the referenced documents, where the data presumably could be found, was not available online. Section 3.1.3 discusses soil sampling conducted within each section as part of the initial RI and it notes that "Results of these investigations are documented in Contamination Assessment Reports (CARs) for each source site or non-source area." However, the CARs for the sections and sites proposed for delisting are not included in the EPA docket. The text goes on to note that additional soil investigations were conducted subsequent to the initial RI and that a surficial soil sampling program was conducted to assess surface soil across the site. Again, the reference provided for the reader, Surficial Soil Program Data Summary, was not available on the EPA docket.

Until the SSAB and Henry & Associates is able to obtain these documents, and devote some time in the months to come, the SSAB is unable to prioritize its questions and concerns that were identified during its initial review of this proposed delisting. The SSAB would like the postponement of the proposed delisting so the SSAB's primary concerns can be fleshed-out and more formally presented to the EPA and RVO for response and follow-up discussion.

Coordination with 5-Year Review

The SSAB believes strongly that the proposed delisting and the associated public comment period should not be conducted until after the current 5-Year Review has been completed and the public has had its opportunity to review the 5-Year Review document, provide comments and work toward resolution of submitted comments and concerns. While some may consider the 5-Year Review to be on a path or timeline independent of the Internal Parcel, there are a variety of logical reasons why the partial deletion should only be proposed after the current 5-Year Review has been completed.

Previous Deletion Review

The current 5-Year Review will be the first time this critical CERCLA step has reviewed a completed partial deletion at RMA, noting that the first partial deletion at RMA was completed in 2003. The public should be able to review the 5-Year Review specific to the previous partial deletion before another partial deletion is executed.

The importance of the public being able to participate in the upcoming 5-Year Review release, specifically for assessing the previous partial deletion, is obvious. Even the Tech Memo supporting the Internal Parcel notes how land-use of the previously delisted property includes youth soccer fields. This land-use certainly requires conservative and methodical evaluation within the 5-Year Review process. And, having submitted significant concerns about the previous deletion, the SSAB would like the opportunity to see the ability of the 5-Year Review process to look back upon and assess a completed RMA partial deletion before it is forced to comment on another partial deletion. It is without question that the SSAB's comments submitted on the current proposed deletion would be heavily influenced by the knowledge and understanding provided from the current 5-Year Review. So, to have the two comment periods reversed, as they are now, is not logical and certainly restricts the public's ability to participate effectively.

Complexity of the Current 5-Year Review

The current 5-Year Review is clearly complicated, given that it is more than a year late and the regulatory agencies produced almost 100 pages of comments on the draft document. It should be noted that the EPA's cover letter submitted with its comments on the draft document indicated the agency "could not validate the determinations made by the Department of the Army regarding overall remedy effectiveness or protection of individual project remedies... because of broad generalizations [within the draft document]," and "could not agree that the groundwater portion of the on-post and off-post remedies adequately protect human health and the environment." The SSAB supports the collaborative effort between the parties and believes the 5-Year Review process should take as long as it needs to, in order to be done well. However, the SSAB equally believes that the public should have a role within the process and that these 5-Year Review issues should be resolved with transparency before another critical step in the CERCLA process is taken at RMA (i.e., the Internal Parcel Deletion).

The challenges being faced by the participating entities in the 5-Year Review process mirror some of the challenges the SSAB is facing in participating in the proposed delisting. In other words, the extent and significance of regulatory comments on the draft 5-Year Review gives credence to the SSAB's findings regarding the Tech Memo supporting the Partial Deletion, mainly that it was short on transparency and supporting data. Furthermore, the delay in releasing the 5-Year Review for public comment by the RVO and regulatory agencies suggests that the proposal by the SSAB, to postpone the delisting until next summer, is a legitimate avenue for making sure the process is done right, and not rushed so an arbitrary time line can be met.

To be clear, the SSAB is not suggesting any intentional effort was made to make the commenting process difficult or to bury needed data, as the meetings and information support provided to the SSAB and Henry & Associates has been much appreciated. What the SSAB is suggesting is that it is clear that the RMA cleanup is complicated and requires significant time and diverse perspectives to make sure decisions are well documented, communicated clearly, and supporting data are included. The SSAB believes the challenges of executing the 5-Year Review and the delay in its finalization, in order to make sure the supporting data is laid out and to increase transparency, is a) not an isolated incident, and b) necessary for the process to work. The SSAB requests that the EPA consider the challenges that agency has faced with regard to the 5-Year Review when deciding whether to grant the SSAB's request for a longer waiting period before executing the proposed deletion.

Quality of Operation and Maintenance

In addition to the extent of comments generated by the regulatory agencies, the type of comments also supports a more tempered and coordinated approach between the proposed de-listing and the 5-Year Review. For example, the EPA commented that certain wells installed in the past have been damaged and not replaced or cannot be located. The SSAB understands that no environmental investigation or remediation process runs flawlessly, but such comments clearly indicate that process improvements

can and should be made. Furthermore, such observations considered in combination with the inherent reduced attention the 11.5 square miles will receive after delisting clearly suggest that a prudent, slower delisting approach is the wiser course. One must ask what mechanisms will be in place to ensure that long-term groundwater monitoring wells located within the Internal Parcel will be maintained after delisting, if there have already been hurdles regarding monitoring well care while the property was still on the NPL?

Given the need for improvement in the draft 5-Year Review, the importance of the 5-Year Review to ensure public health and safety, and the fact that this delisting is being proposed prior to the public release of the 5-Year Review, the SSAB asks the simple question: What is the great value to the people of Denver, the State of Colorado and even the Department of Army that this deletion take place in fiscal year 2006 versus fiscal year 2007? Furthermore, if the EPA finds the RVO's argument compelling, that delisting this year is critical, the SSAB would like the EPA to consider what is lost in the NCP principle and requirements of public participation, and what potential risks to the public may go unidentified in the future, before making its final decision to support this large, piece-mail de-listing.

Deletion Approach and Exposure Pathways

Subsurface Soil

The fact sheet proposing the delisting states, "All remedial actions required by the ROD for surface media (soil, surface water and sediment) and structures have been completed in the areas within the Internal Parcel that lie east of E Street." Given that the deletion would include "surface media" and the groundwater east of E Street that lies beneath it, it is not clear why the proposed deletion does not discuss the subsurface soil that lies in between. Since there is no real discussion regarding subsurface soil, there is no discussion about how soil characterization was conducted for the subsurface soil, noting that the SSAB is aware of other areas on the Arsenal where sampling and remediation differed based on whether the soil was surface soil or subsurface soil. Since subsurface soil is a pathway specifically considered in the CERCLA risk assessment process (e.g., construction workers, erosion, etc), the documentation should specifically address this medium, but neither the fact sheet nor the Tech Memo appears to address this issue. Before the delisting of 11.5 square miles of NPL land is completed, the SSAB believes it is appropriate that each of the media should be addressed clearly within the primary documents guiding the proposed delisting, namely the fact sheet and the Tech Memo.

The fact sheet does note that the Interim Institutional Control Plan for RMA does include restrictions on the construction or the use of basements, but the fact sheet does not mention whether there are certain controls or outright prohibition on such activities. Another bullet in this discussion notes "prevention of excavation into a site containing pesticide contamination," but there is no mention about excavation in other areas within the Internal Parcel. How will the Fish & Wildlife Service (FWS) make sure their own personnel and public visitors do not dig in the Internal Parcel?

With regard to future use, there is no discussion about potential access to the subsurface through ecological activity. For instance, the SSAB is aware of previous

discussions to place buffalo on the RMA Refuge, yet there is no evaluation of whether this and other range activity might bring subsurface soil to the surface over time.

Chemical Volatility and the Air Pathway

The pending deadline for comments dictates that the SSAB express its significant preliminary concerns regarding the proposed deletion of property adjacent to or on top of significant groundwater contamination, and property adjacent to areas where significant chemical concentration remains in the surface or subsurface soil. Specifically, the proposed deletion of Section 27, portions of Sections 23, 24 and 35, and a peculiar 50-ft strip of Section 26 seems shortsighted.

The SSAB is in the process of getting a better understanding of the nature and extent of groundwater contamination, and is appreciative of the recent meeting we had with the State of Colorado and the RVO to discuss this matter. While volatility of contamination within the groundwater may or may not be an issue at RMA, it should be noted that this pathway is a growing pathway of concern in hazardous waste investigations across the country. The SSAB is concerned with the threat of volatile contamination within the groundwater reaching ground surface in de-listed acreage and would like to hold future discussions with the participating agencies regarding this matter. On this basis alone, and considering the fact that groundwater plume migration is not actively tracked through mapping the on-post plume, it does not appear that the sections overlying the major plumes should be de-listed.

Even a greater concern for the SSAB is the potential risk for emissions from areas of active surface remediation or subsurface contamination drifting to de-listed property. The SSAB believes it makes absolutely no sense for the EPA or State of Colorado to support this de-listing in these areas. Clearly, the EPA or State is concerned about the potential for air exposure or flaws in access control, or both, if there is an agreement to restrict access to the northwestern portion of the Internal Parcel. Given the historical incident of "blue haze" and the more recent discovery of contaminant concentrations 10 times higher than expected at Basin F, the SSAB strongly objects to the delisting as proposed. Just because specific soil sites have been remediated within a property section, it does not mean that all the risks to receptors have been addressed.

With regard to the human sniffing technique, the SSAB is concerned that its use increases the likelihood of public exposure to air emissions from the pathways noted above. First, it is the SSAB's understanding that the RMA is the only site where it is used, at least within the State of Colorado. Second, Henry & Associates has worked on some of the most complex military sites in the country and has never encountered this technique. Third, previous SSAB review of site plans revealed a tendency for the RVO to use the sniffing technique as a surrogate for more frequent air sample collection and analysis. As a result, the SSAB asked the RVO for data that showed the correlation between detection of volatile compounds through sniffing compared to actual chemical concentrations based on lab analysis. Alarming, the SSAB was informed that this correlation data do not exist.

Whether it be from air exposure from the ongoing clean-up activities or the risk for someone from the public to stray into an active work area, de-listing the central and

northwest sections of the Internal Parcel now is simply not prudent, and may well result in unnecessary exposure in the future. The SSAB has already been asked by a reporter about the risks from exposure to air, particularly on the sections within the Internal Parcel, and this issue will only get more attention in the years to come as populations grow and encroach upon former RMA land and the wastes that remain. In turn, the SSAB believes it is important that all involved start an open discussion about air pathways risks from contamination left on site now, before completing this major deletion, instead of waiting to address the issue after public use and the adjacent population density increases further. The SSAB is strongly interested in learning what discussions took place regarding the distance considered to be an adequate buffer between remaining contamination and property suggested for de-listing. If these discussions took place, the SSAB requests a list of the exposure factors, modeling parameters, and/or other considerations that showed downwind risks on the delisted portions will not be a problem.

One other issue related to this remaining exposure pathways concern is institutional controls. Steps to restrict access to the northwest portion of the Internal Parcel is one of several institutional controls to protect members of the public (e.g., visitors). The SSAB is currently reviewing the Interim Institutional Control Plan and will submit comments and concerns on this document separately. However, in the context of these comments, the SSAB would like to make it clear that it is patently unfair to be forced to comment on a major de-listing for property surrounding the areas of major contamination prior to having a final plan for institutional controls.

Understanding how the “nuts and bolts” of the institutional controls will work in the future requires more time than is available during this comment period. It must be acknowledged that once the land is de-listed and transferred, the institutional controls are the only mechanism through which public safety and protection of the environment is controlled. In turn, given the nature of RMA, it is impossible to adequately comment on a proposed delisting without having a concurrent detailed discussion of the institutional controls. While the SSAB understands the final institutional controls plan cannot be completed until the landfill and caps are completed, it is not appropriate to place the burden of this catch-22 on the public. How is the public supposed to comment on the adequacy of public protection for property to be de-listed now that is directly adjacent to large areas of contamination that will not have remedies in place nor have associated institutional controls for several years to come? Given this challenge, the SSAB requests more time to evaluate this issue and hold the appropriate discussions with the participating agencies.

Adequacy of Characterization

Ordnance Areas

The SSAB is concerned about the level of characterization conducted in the property proposed for deletion. While a pit was recently identified in Section 29 as part of the Demolition Range Exclusion Zone (DREZ) work is not part of the Internal Parcel, how this site is being handled and the potential implications for surrounding sections that are part of the proposed de-listing is troublesome. While the unexploded ordnance

(UXO) team was clearing some items in this pit, one of the workers experienced symptoms of some type of exposure. As a result of this, the personnel pulled back from the area and another team moved in to collect some soil samples in accordance with their health and safety plan. Through an e-mail response, the TAG Group was informed that no chemicals of concern were identified during this sampling, except for some low levels of benzene. However, the SSAB has some concern that the appropriate characterization sampling was not collected.

Through working with the RVO and the State of Colorado, the SSAB has obtained the work plans associated with this effort in Section 29, as well as the data and comparison criteria. Henry & Associates is reviewing these materials, and the SSAB will pursue more detailed discussions regarding the DREZ activity separately. However, the responses from the RVO on this site notes that it is "similar to others previously remediated on RMA." Additionally, from what SSAB has surmised thus far through conversations and written responses, it appears that the trigger and approach used for conducting soil sampling in this burn pit are the same or similar to those used at "other" sites. If this is the case, there are several concerns that would be pertinent to the currently proposed deletion.

Based on responses from both the State of Colorado and the RVO, it appears that soil samples were only collected out of a concern for the health and safety of the workers, which is problematic for two reasons. First, while the TAG Group certainly supports the protection of the workers, the issue of site characterization also should be addressed. As a matter of regular CERCLA investigation, soil samples would be collected from a "potential burn/burial site" for the purpose of determining the level of residual contamination resulting from the past burning/burial activity. However, based on preliminary communications with the RVO, it appears that this type of characterization sampling may not have been done at RMA. Apparently, if the on-site worker did not have symptoms there would not have been *any* soil samples collected. The TAG Group cannot conceive a logical, technical reason for why this would be the case and is concerned that the ROD restriction on the number of soil samples that can be collected post-ROD has impacted the characterization of the parcel proposed for deletion.

The second problem with this approach is that sampling and analysis conducted for worker health and safety reasons, as well as the comparison criteria used, can be very different than sampling and analysis conducted to characterize a pit. For instance, based on a preliminary review of the available data, it appears the soil samples were not analyzed for metals, which I assume was skipped because metals are generally not volatile (mercury being an exception) and not an acute threat to the worker. However, metals would be one of the most important classes of analytes/compounds one would analyze for in a munitions burn pit, given that metals are used in a variety of munition components and fills. Similarly, explosives were also not analyzed for, and would be an important parameter to look at for in a munitions pit, as well as the groundwater beneath it.

If characterization was not a specific focus when other similar sites were remediated within the proposed deletion parcel, then it is very possible soil contamination

could have been missed elsewhere and that this contamination could impact future land users (hikers), and/or ecological receptors. The potential migration of such soil contamination to the groundwater pathway would also have to be considered. The SSAB believes the de-listing should be postponed to allow review of past ordnance-related removals within the 11.5 square miles proposed for deletion. The SSAB also requests a list of the ordnance disposal, testing and/or burn areas within the Internal Parcel where debris has been found and/or removed.

Related to these ordnance pit characterization concerns, it should be noted that the small area within Section 31 that is excluded from the Internal Parcel, is an area where a previous burn pit had been missed and only discovered later because that site was being used as a barrow area. The SSAB would like to be provided a list of the sites within the Internal Parcel where sites were either missed or thought to have been remediated and only later found to contain additional contamination.

Groundwater

Under the current deletion proposal, groundwater east of E Street would be deleted from the NPL. However, the characterization and long-term monitoring of the groundwater is a very important issue for the SSAB, and the group needs more time to review the characterization conducted on the groundwater area proposed for deletion.

Using the DREZ area as an example, the Internal Parcel includes the groundwater shown to be immediately down gradient of the DREZ (white circular area on the fact sheet map) located in sections 19, 20, 29 and 30; the DREZ itself has been excluded from the proposed deletion. If the EPA is to accept the deletion of groundwater down gradient from an area where past and/or current ordnance disposal has been conducted, then there needs to be clear data that shows the groundwater has been characterized and found not to be impacted. Furthermore, soil characterization should have been conducted to show that soil-to-groundwater migration is not a concern. While this characterization may have been conducted, it was not obvious from review of the Tech Memo and will require time to identify the appropriate documents and assess the available data.

There are several reasons for concern in this area. First, various explosives have been shown to contaminate groundwater from surface demolition and disposal activities. Second, the groundwater well maps reviewed by the SSAB thus far do not indicate many wells in this area. Of particular note is the lack of wells in Sections 20 and 29 where localized groundwater from the eastern half of the DREZ flows to the northeast, away from the groundwater monitoring systems. It should also be noted that the groundwater contour lines in these areas are dashed, suggesting that groundwater flow is either particularly complicated and/or has not been adequately characterized. Third, the recent work in Section 29 where the worker apparently had symptoms of exposure suggests that some chemicals associated with ordnance and/or disposal activity are present at concentrations where potential impacts to groundwater should be considered.

A simple starting point would be the question: Has the RVO compiled a list the types of munitions likely detonated and/or disposed of east of E Street and sampled the groundwater down-gradient from known detonations and disposal sites for munitions-related analytes and chemicals?

Soil/Sediment

The Tech Memo acknowledges that the participating entities thought remediation was complete at the Sand Creek Lateral and Basin B Drainage Ditch, but new contamination has been found at these locations and, as a result, they have been excluded from the Internal Parcel. The SSAB is appreciative of the honesty and transparency shown by admitting that contamination was missed by previous investigation or remediation, and notes that this is not surprising because environmental investigation is always iterative and never perfect. But this discovery of additional contamination in Section 35 leads to two important concerns regarding this section.

The SSAB does not support or understand why such a Swiss-cheese approach would be taken, particularly in Section 35. The facts that a) contamination was previously missed in this section, b) that this missed contamination adds uncertainty to the quality of characterization in the area, and c) the resulting exclusion breaks up the section, all suggest that delisting Section 35 is premature. The Tech Memo does not explore the additional contamination found at Sand Creek Lateral. Such information is necessary to explain how contamination was missed, and to allow the reader to assess whether the 50-ft buffer is sufficient for selecting what land adjacent to the Sand Creek Lateral still should be de-listed at this time. Additionally, the lack of explanation does not allow the SSAB or other members of the public to make an assessment of what happened during the first remedial effort, and evaluate whether it is possible other characterization nearby may have fallen short. The TAG Group understands that not everything can be included in the Tech Memo and that the Sand Creek Lateral is not part of the Internal Parcel, nonetheless, Sand Creek Lateral information is vital information if the RVO and the EPA are going to move forward with the proposed de-listing of this section. It cannot be overstated that such sections are near the center of RMA, an area of significant historical activity, and existing contamination and ongoing remediation. All caution should be taken in these areas when selecting what property to de-list when, and allowing the public to assess the 5-Year Review prior to completing this de-listing certainly should be part of that cautious approach.

Compliance with the Rocky Mountain Arsenal National Wildlife Refuge Act of 1992

On page 2 of the Tech Memo, it is noted that "Once certification [from the EPA] has been received, the Army shall transfer to USFWS jurisdiction over the certified property, except for certain property and facilities required to be retained by the Army for water treatment..." First, the SSAB questions whether the proposed plan to transfer property where the treatment systems are located is appropriate given the Act. Second, if this approach is considered acceptable based on legal interpretation, the SSAB would like to know what stops the U.S. Army from transferring all land to USFWS, including where the landfills and major caps will be. It is not clear how maintenance of a landfill or cap would require any different ownership or access than the groundwater treatment system, and if this is the case, the SSAB strongly suggests that the EPA consider the precedence being set by permitting the de-listing of the areas where groundwater treatment is a major and ongoing remedial action.

Future Responsibility

In the fact sheet distributed for this proposed deletion, there is a text box discussing future responsibility and how this partial deletion does not impact aspects of the cleanup. Specifically, the text box states how this proposed delisting does not impact:

- a) EPA's ability or responsibility to conduct responses in portions not deleted;
- b) responsible party liability or EPA's ability to recover costs; and
- c) the U.S. Army and Shell Oil Company's responsibilities for future remedial actions required at the area deleted, if future site conditions warrant such actions.

The text does not address whether this de-listing could conceivably impact the ability of the EPA or State of Colorado to get additional investigation in the deleted area, if future information warrants such action. First, as referenced within these comments, the SSAB is not certain that all the necessary characterization has been conducted in the area proposed for deletion. In turn, it is possible the SSAB might ask for additional sampling in the future and it is important that the EPA does not compromise its ability to request such sampling, if the arguments put forth by the SSAB or other members of the public are convincing. This SSAB concern is only reinforced by the observation that both the EPA and the State of Colorado appear to be hindered from asking for characterization sampling in specific instances, as a result of the On-Post Record of Decision. While the sampling limits incorporated into the ROD is an issue to be discussed through another mechanism, the importance for the regulatory agencies to not further limit their authority is very germane to this proposed deletion. The SSAB requests that a written response on this specific issue include clear confirmation from EPA counsel that this de-listing would not hinder the EPA's ability to request additional characterization sampling in the de-listed property.



JOHN AND NANCY
CHRISTIAN
<njc6775@msn.com>
06/19/2006 11:45 AM

To Jennifer Chergo/OCP/R8/USEPA/US@EPA
cc
bcc
Subject

June 19, 2006
Comments on the Internal Deletion

My concern is that signs alone are not going to keep people out of the contaminated areas, I feel that we need to have fencing around these areas.

If they do deletion in pieces, then there is too great of a chance that they will find contamination after the deletion, such as the Sand Creek Lateral.

To delete any part of the land prior to the completion of the five year review is outrageous, because the public hasn't had the opportunity to see how the treatment is working.

Thank you Nancy Christian
SSAB, also Commerce City resident

May 22, 2006

Ms Jennifer Chergo
Community Involvement Coordinator (8OC)
USEPA, Region 8
999 18th St, Suite 300
Denver, CO 80202-2466
Dear Ms Chergo,

I cannot support the proposed deletion of areas within the current Rocky Mountain Arsenal from the National Priorities List as described by Docket No. EPA-HQ-SFUND-1987-0002. It will result in a cookie-cutter arrangement of toxic sites under clean-up surrounded by wildlife refuge activities. The areas of remediation should be contiguous. The proper time to transfer these lands is when the total clean-up is final.

Kind Regards,



Anne Rooney



Kevin Hennegan
<hennegank@katewwdb.com>

05/20/2006 02:02 PM

To Jennifer Chergo/OCP/R8/USEPA/US@EPA

cc

bcc

Subject Docket No. EPA-HQ-SFUND-1987-0002

Dear Ms. Chergo:

I cannot support the proposed removal of areas within the current Rocky Mountain Arsenal from the National Priorities List as described by Docket No. EPA-HQ-SFUND-1987-0002. Such a step would result in a patchwork quilt of toxic sites under clean-up surrounded by wildlife refuge activities. The areas of remediation should be contiguous. The proper time to transfer these lands is when the all clean-up activities are complete.

Sincerely,

Kevin Hennegan
8381 E. 29th Ave.
Denver, CO 80238



Sandy Horrocks
<sandy.horrocks@comcast.net>
et>

06/25/2006 11:27 PM

To Jennifer Chergo/OCP/R8/USEPA/US@EPA
Sandy Horrocks <sandy.horrocks@comcast.net>, Kirk
Cunningham <kmcunnin@JUNO.COM>, angela medbery
<a.medbery@juno.com>, dot Colagiovanni
bcc
Subject Comments regarding proposed area RMA delisting - Docket
ID #EPA-HQ-SFUND-1987-0002

Jennifer,

Comments for the proposed delisting of a portion of the Rocky Mountain Arsenal Subcommittee of the Rocky Mountain Chapter of the Sierra Club are included below. If you have any questions regarding these comments please contact me by phone at 303 470-1352.

Yours truly,

Sandra Horrocks

1452 Northcrest Dr.
Highlands Ranch, CO 80126
June 25, 2006

Ms. Jennifer Chergo
Community Involvement Coordinator (80C)
U.S. EPA, Region 8
999 18th Street, Suite 300
Denver, Colorado 80202-2466

Re: Docket ID #EPA-HQ-SFUND-1987-0002

Jennifer,

The Rocky Mountain Arsenal Subcommittee of the Rocky Mountain Chapter of the Sierra Club disagrees with the current proposed deletion of RMA lands from the National Priorities List. Our reasons are as follows.

1. As we have stated in the past, we believe that the entire RMA site should be remediated before areas within this site are delisted. The Arsenal remediation design in the Record of Decision was for a single operable unit, not several units, and so should be treated as such.

2. Most sections of the Arsenal in the current proposal include excluded areas that will not be delisted at this time. We do not agree that sections should be delisted when portions of them have not been totally remediated upon delisting. This leaves wide-open the possibility that contaminated areas may later be found to be larger than currently is known, something we've seen in several other contaminated locations at RMA. This could result in the need to re-list an already delisted area.

3. We strongly disagree with any proposal to delist areas of groundwater under RMA. We do not believe that this proposal has been properly modeled or evaluated, and that it could result in aquifer extraction which could alter groundwater flow to the boundary treatment facilities.

4. We are concerned that this delisting proposal is being pushed through before proper remediation has been completed. If allowed to be implemented, this proposal will create a non-contiguous 'swiss cheese' type of wildlife refuge with contaminated areas surrounded by delisted 'clean' areas for the time being. This will cause confusion for both workers and visitors alike.

We are concerned that there seems to be a 'rush to delist' at the Rocky Mountain Arsenal. Given that the completion date for this project is 2011, and it is now only 2006, we view this as unnecessary. We believe a greater emphasis on remediation and completion of the five-year review would be more appropriate areas of concentration at this time.

Yours truly,

Sandra Horrocks
Chairperson, Rocky Mountain Arsenal Subcommittee
Rocky Mountain Chapter, Sierra Club

June 12, 2006

My comments regarding the deletion of the internal parcel at the Rocky Mountain Arsenal.

I do not want to see any part of the Rocky Mountain Arsenal deleted until the whole site is cleaned up.

The deletion of the internal parcel of the Rocky Mountain Arsenal in pieces and parts makes it hard, if not impossible, to be protective of human health and the environment.

Premature deletion places a risk of contamination being discovered after deletion occurs and putting human health and the environment in jeopardy. Such was the case in a past partial deletion when contamination was discovered at the Sand Creek Lateral. It would appear the remedy is not functioning as it should.

No deletion should occur until the 5 year review for 2005 is completed and submitted for public review.

Furthermore there are no fences or barriers to keep visitors of the Wildlife Refuge out of restricted areas. Signs are not adequate to keep people out of restricted areas.

Additionally I want to see the Colorado Department of Health and Environment and the Environmental Protection Agency take a more conservative approach in consideration of any future deletion.

Respectively submitted,


Mary Light

7910 Poplar St.

Commerce City, CO 80022

Light5683@aol.com

Todd, Levi

From: Chergo.Jennifer@epamail.epa.gov [Chergo.Jennifer@epamail.epa.gov]
To: Williams.Laura@epamail.epa.gov; Todd, Levi
Cc:
Subject: Fw: Docket ID No. EPA-HQ-SFUND-1987-0002
Attachments:  Commerce City Resolution Support Deletion.pdf(73KB)

Sent: Mon 6/26/2006 2:55 PM

-----Forwarded by Jennifer Chergo/OCP/R8/USEPA/US on 06/26/2006 02:55PM -----

To: Jennifer Chergo/OCP/R8/USEPA/US@EPA
From: "Acre, Tom - CM" <tacre@ci.commerce-city.co.us>
Date: 06/26/2006 10:31AM
Subject: Docket ID No. EPA-HQ-SFUND-1987-0002

I am forwarding you a copy of the Resolution passed by the City of Commerce City supporting deletion of the Internal Parcel.
 The City of Commerce City supports the partial deletion of the Internal Parcel of the On-Post OU of the RMA/NPL site. Commerce City Council passed the attached resolution supporting the deletion of approximately 7,400 acres of the Rocky Mountain Arsenal from the National Priorities List and the transfer to the Rocky Mountain Arsenal National Wildlife Refuge.

Tom Acre
 Regional Projects Manager

"Quality Community for a Lifetime"

City of Commerce City
 City Manager's Office
 5291 East 60th Avenue
 Commerce City, CO 80022

phone: 303.289.3758
 fax: 303.289.3688
 e-mail: tacre@ci.commerce-city.co.us

**RESOLUTION SUPPORTING DELETION OF THE ROCKY MOUNTAIN ARSENAL
INTERNAL PARCEL DELETION AREA FOR TRANSFER TO THE ROCKY
MOUNTAIN ARSENAL NATIONAL WILDLIFE REFUGE
NO. R 2006-21**

WHEREAS, in 1942 the Rocky Mountain Arsenal (the "Property") was transformed into a federal facility used to supply armaments for World War II; and

WHEREAS, after World War II the Property was used to produce agents for military purposes and pesticides for commercial sale; and

WHEREAS, in 1992 Public Law was passed establishing the Rocky Mountain Arsenal National Wildlife Refuge on the Property; and

WHEREAS, in 1992 the U.S. Fish and Wildlife Service began the process of managing the Property for the purpose of wildlife habitat and environmental conservation; and

WHEREAS, a large monetary investment has been made to restore the vast majority of the Property for beneficial public use; and

WHEREAS, the residents of the City of Commerce City have been looking forward to the transformation of the Rocky Mountain Arsenal into a wildlife refuge that can be used and enjoyed as an outstanding and exemplary wildlife refuge for the entire United States; and

WHEREAS, the process has officially begun to delete an additional 7,400 acres of the National Priority List Site of the Rocky Mountain Arsenal for transfer to the Rocky Mountain Arsenal National Wildlife Refuge

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF COMMERCE CITY that the City of Commerce City, by this resolution, does support and requests deletion of approximately 7,400 acres of the Rocky Mountain Arsenal from the National Priority List, known as the Internal Parcel Deletion Area, for transfer to the Rocky Mountain Arsenal National Wildlife Refuge as an amenity for Commerce City residents and the surrounding metropolitan area.

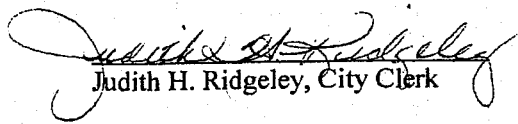
RESOLVED AND PASSED THIS 1st DAY OF May, 2006

CITY OF COMMERCE CITY, COLORADO

By: 

Sean Ford, Mayor

ATTEST:


Judith H. Ridgeley, City Clerk

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Co., in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

The Rocky Mountain Arsenal has played an important role in the life of our nation, and I am pleased to know that it will continue to serve as a valuable cultural, environmental and recreational asset. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure the delisting process proceeds expeditiously in the best interests of the community.

Sincerely,

Bill Perkins, Jr.
Shell Oil Co. Retired

Shell Oil Company



P.O. Box 538

Commerce City, CO 80037

May 19, 2006

Dear Shell Retiree:

The Rocky Mountain Arsenal is on the verge of celebrating another milestone as we complete the transition of the site into a premier urban national wildlife refuge.

In late April, the Environmental Protection Agency (EPA) finished its site investigation of roughly 7,400 acres that are known as the Internal Parcel Deletion Area. The EPA plans to remove this parcel from its Superfund list, which would allow the U.S. Army to transfer the land to the U.S. Fish and Wildlife Service. If this process proceeds on schedule, **the Rocky Mountain Arsenal National Wildlife Refuge would more than double in size by the end of the year.**

The EPA is accepting public comments about the proposed deletion, and we invite you to send a letter by June 30 indicating your support for the refuge expansion. As a former employee, you understand the unique role the Arsenal has played in our national life and appreciate how far we have come in transforming this site into a community asset.

Enclosed is a sample letter with suggested language for your consideration, as well as a recent newspaper article that provides more information about the proposal. If you support the deletion, please mail, e-mail or fax your letter to the EPA at the following location:

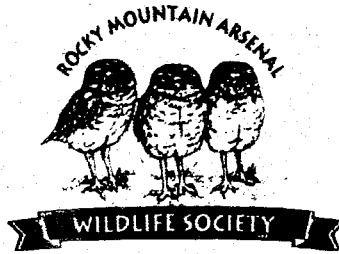
Ms. Jennifer Chergo
Community Involvement Coordinator
U.S. EPA, Region 8
999 18th St., Suite 300
Denver, CO 80202-2466
E-mail: chergo.jennifer@epa.gov
Fax: 303-312-6961

Or, you can submit your comments online at www.regulations.gov. You must identify the project as Docket ID Number EPA-HQ-SFUND-1987-0002. Thank you for your past service to Shell Oil Co. and for your continuing support of our work at the Rocky Mountain Arsenal.

Sincerely,

Roger Shakely
Denver Site Manager
Shell Oil Co.

Enc.



June 22, 2006

Ms. Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency
Region 8
999 18th Street, Suite 300
Denver, Colorado 80202

2006 JUN 26 AM 11:37

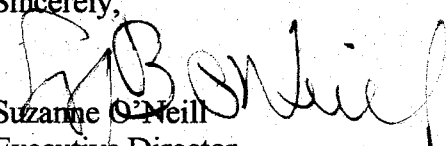
RECEIVED
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 8
JUN 26 2006

Dear Ms. Chergo:

The Rocky Mountain Arsenal Wildlife Society, through its board of directors, enthusiastically supports the proposed deletion of approximately 7,400 acres. We are pleased that the remediation actions have been completed with respect to these acres.

Following deletion, and transfer to the U.S. Fish and Wildlife Service, this land will become a vital addition to the Rocky Mountain Arsenal National Wildlife Refuge. The Refuge is a unique asset that provides an important opportunity for youth and adults to learn about and appreciate the dwindling short grass prairie ecosystem. Educational experiences gained at the Refuge, located in this rapidly growing large metropolitan area, create a powerful linkage between urban families and nature.

Sincerely,


Suzanne O'Neill
Executive Director

ROCKY MOUNTAIN ARSENAL NATIONAL WILDLIFE REFUGE
BUILDING 111
COMMERCE CITY, COLORADO 80022
(303) 289-0820
B-9

501(C)(3) NONPROFIT CORPORATION

E.L.K.

Environmental Learning for Kids

June 21, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

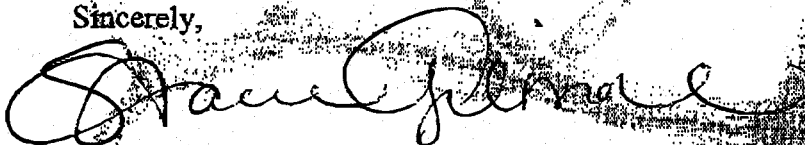
Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Company, in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

Even though the Arsenal has presented environmental challenges to the surrounding communities, the long-term benefits of this open space will provide equity and education to generations of people in the local area. The delisting of the IPDA is an important step in the continuing growth of the area and its economic and community well-being. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service, in collaboration with local community groups such as Environmental Learning for Kids, to ensure this process proceeds expeditiously in the best interests of the community.

Sincerely,



Stacie Gilmore
Executive Director
Environmental Learning for Kids

Jennifer L. Keyser
4255 Kittredge Street, #716
Denver, CO 80239
June 22, 2006

Ms. Jennifer Chergo
Community Involvement Coordinator (8OC)
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 300
Denver, CO 80202-2466

Dear Ms. Chergo:

I am writing to support the delisting of areas on the Rocky Mountain Arsenal known collectively as the Internal Parcel Deletion Area (IPDA). I am a United States Fish and Wildlife Service (USFWS) Volunteer at the Rocky Mountain Arsenal Wildlife Refuge and have received regular updates on the progress of the Arsenal's cleanup. Because of my awareness of the efforts undertaken by the Corps of Engineers, Shell Oil Company, EPA and others, I am sure the cleanup of that parcel of land has been done in a way that is fully protective of human health and the environment.

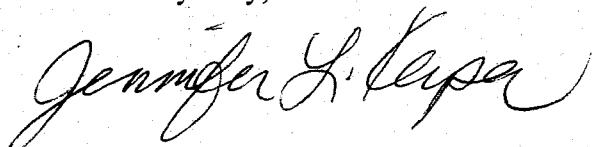
I realize from my volunteer efforts, and from updates in the Remediation Venture Office's (RVO's) "Milestones" publication, that the Arsenal has worked diligently to transform itself from a toxic cleanup site, to a national wildlife refuge that will help the social development and economic growth of Commerce City and the entire Denver metro area. Transferring the IPDA parcel transfer to USFWS would be a tremendous step toward realizing the vision of what the Refuge could become.

I have volunteered at the Rocky Mountain Arsenal for about five years. From my vantage point on-site, I've watched the steady and impressive cleanup progress over that time. I would not be so willing to go out there as I am if I weren't convinced the RVO and all involved have done a great job. And I want to see the Arsenal delist the IPDA as soon as practical, so that the public will get the benefits intended when the concept of creating an urban Wildlife Refuge from the cleanup areas was first announced.

If you have lived in the Denver area for any length of time, you know that growth and population pressures are mounting on the northern side of the urban area. This will lessen the amount of habitat for wildlife, and reduce open space for human recreation and enjoyment. Increasing the scope of the Refuge appropriately, and turning it over to USFWS for implementation of plant and habitat upgrades will make for a win-win situation for the area's wildlife, and human population.

I do trust you will take my concerns into account as decisions on the IPDA are made. Thank you for your interest.

Yours very truly,





Diane Buell
<psthc@msn.com>
06/09/2006 05:34 PM

To Jennifer Chergo/OCP/R8/USEPA/US@EPA
cc
bcc
Subject Delisting of the Rocky Mountain Arsenal property - (IPDA)

June 9, 2006

Ms. Jennifer Chergo
Community Involvement Coordinator (8OC)
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 300
Denver, CO 80202-2466

Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Company, in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

As a refuge volunteer, I have worked at Rocky Mountain Arsenal for 16 years. Because of my first hand experience, I'm confident that the agencies involved in the Arsenal cleanup have done a safe and thorough job. If I did not, I would not have volunteered for all those years. We are fortunate to have the Rocky Mountain Arsenal in our backyard. The delisting of the IPDA is an important step in the continuing growth of the National Wildlife Refuge

Sincerely,

Diane Buell
5340 Troy St.
Denver, CO 80239
(303) 371-1294

June 9, 2006

Ms. Jennifer Chergo
Community Involvement Coordinator (80C)
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 300
Denver, CO 80202-2466

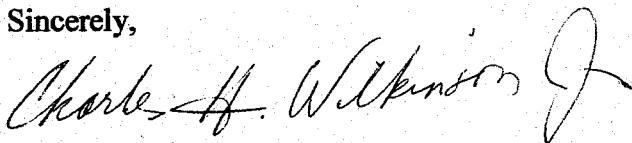
Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Company, in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

As a refuge volunteer, I have worked at Rocky Mountain Arsenal for over a year and a half. Because of my first hand experience, I'm confident that the agencies involved in the Arsenal cleanup have done a safe and thorough job. The IPDA is clean, and it is ready to become part of the refuge. We are fortunate to have the Rocky Mountain Arsenal in our backyard. The delisting of the IPDA is an important step in the continuing growth of the National Wildlife Refuge. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure this process proceeds expeditiously in the best interests of the local community and all of the American people.

Sincerely,



Charles H. Wilkinson, Jr.
8802 East 24th Place, Unit# 105
Denver, CO 80238

June 8, 2006

Ms. Jennifer Chergo
Community Involvement Coordinator (8OC)
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 300
Denver, CO 80202-2466

Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Company, in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

As a refuge volunteer, I have worked at Rocky Mountain Arsenal for 3 years 4 months. Previously involved as a representative of Denver Water for 4 years regarding relocation of Water Conduits. Because of my first hand experience, I'm confident that the agencies involved in the Arsenal cleanup have done a safe and thorough job. The IPDA is clean, and it is ready to become part of the refuge. We are fortunate to have the Rocky Mountain Arsenal in our backyard. The delisting of the IPDA is an important step in the continuing growth of the National Wildlife Refuge. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure this process proceeds expeditiously in the best interests of the local community and all of the American people.

Sincerely,

Henry A. Workman III

Fax: 303-312-6961

E-mail: chergo.jennifer@epa.gov



mp59@comcast.net
06/08/2006 10:07 AM

To Jennifer Chergo/OCP/R8/USEPA/US@EPA
cc
bcc
Subject volunteers for RMA acreage tranfer to Fws

I have been a volunteer with the Rocky Mountain Arsenal Refuge for the last 18 Months . Previous to this move I had relatively no knowledge of the refuge. I presonnally have discovered that the public has an extremely high desire to acquire more of the RMA area turned over to the FWS for refuge use. As one who answers a large number of calls for tour reservations, and education programs, I believe that with additional acreage that our programs have will have a very high impact on the general public visits and edicational tours for the school progarms. I WISH TO FULLY SUPPORT THIS TRANSFER.

RICHARD H. PREW

523 Melody Dr.

Northglenn, Co. 80260



Audubon COLORADO

1966 13th Street, Suite 230
Boulder, CO 80302
Tel: 303-415-0130
Fax: 303-415-0125
www.auduboncolorado.org

June 20, 2006


Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA) and the transfer of this land to the U.S. Fish and Wildlife Service. I have toured the area and am confident that the necessary remediation activities have taken place to ensure the land is fully protective of human health, wildlife and the environment.

Audubon Colorado is working with the U.S. Fish and Wildlife Service and Commerce City to expand environmental education efforts in the area. The expanded Rocky Mountain Arsenal National Wildlife Refuge will be an important part of these outdoor learning efforts.

Sincerely,



Gary Graham
Executive Director

11975 W 67th Place
Arvada, CO 80004-2374
May 21, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region VIII
999 Eighteenth Street, Suite 200
Denver, CO 80202-2466

Re: Docket ID #-EPA-HQ-SFUND-1987-0002

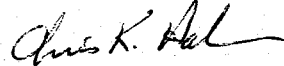
Dear Ms. Chergo:

I am writing you to indicate my support for the upcoming delisting of the Rocky Mountain Arsenal [RMA] property known as the Internal Parcel Deletion Area. I believe that all parties connected remediation activities at the RMA have implemented the requisite remediation to insure that the property is protective of the human health and environment.

I have been supportive of the remediation efforts on the RMA to ensure it is a valuable asset to the Denver and surrounding communities. This is and will become an even greater asset to these communities with the transfer of this land to the U.S. Fish and Wildlife Service.

While the RMA has served our nation well in the past, it is now ready to do so in the future. I look forward to seeing this land continuing to serve the community in the future when it is released to serve the public in the future a part of an ever growing wildlife habitat.

Sincerely yours,



Chris K. Hahn

18431 Westridge Road
Cedaredge, Colorado 81413
May 26, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. EPA, Region 8
999 18th Street, Suite 300 or 200
Denver, Colorado 80202-2466

RE: Docket ID # EPA-HQ-SFUND-1987-0002

Dear Ms. Chergo:

I have read information informing me that the Rocky Mountain Arsenal property known as the IPDA (Internal Parcel Deletion Area) is coming up for delisting. May you know, I support the delisting.

I worked for Shell Oil as a field pipefitter for 25 years. I am confident from experience that Shell Oil goes the "extra mile" to satisfy the EPA and themselves in creating an environment safe for all "Life".

The transformation of this site by Shell Oil and the U.S. Army is another episode showing "Clean-Up" can be done. Now, may we all enjoy the area ~~thru~~ through the U.S. Fish and Wildlife Service!

Sincerely
Larry Jon Fencel

May 26, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

Dear Ms. Chergo:

The Rocky Mountain News reported that the Environmental Protection Agency is proposing to turn over almost 7,400 acres of the Rocky Mountain Arsenal to the U.S. Fish and Wildlife Service. This step toward a major expansion of the wildlife refuge is good news for us in the metro area.

I am writing this to support the proposal.

Sincerely,

A handwritten signature in cursive script that reads "M. Patrick Swingle".

M. Patrick Swingle
PO Box 440907
Aurora, CO 80044-0907

Neil Botting

From: "Neil Botting" <Neil@peakinet.net>
To: <chergo.jennifer@epa.gov>
Sent: Wednesday, May 24, 2006 8:45 AM
Subject: Docket ID Number EPA-HQ-SFUND-1987-0002

Re: Docket ID Number EPA-HQ-SFUND-1987-0002

Ms. Chergo,

It is time!

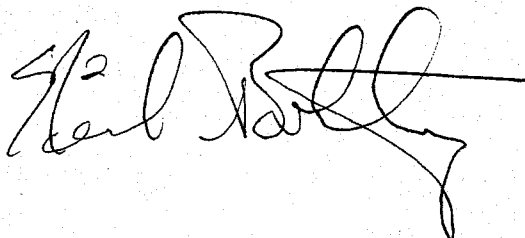
I fully support the delisting of the Rocky Mountain Arsenal property designated: the Internal Parcel Deletion Area. I have visited the RMA and have seen the remediation work and the abundant wildlife; the IPDA is clearly ready to be delisted.

It is also ready to be turned over to the U.S. Fish and Wildlife Service so that we can enjoy a major expansion of an outstanding wildlife refuge.

The efforts of the U.S. Army and the others involved has been outstanding! If we are to encourage others to do a good job of remediation at other sites, we must demonstrate that such efforts may be ended when the goals are accomplished.

Thank you,

Neil Botting
Florissant, CO

A handwritten signature in black ink, appearing to read "Neil Botting", with a long horizontal stroke extending to the right.

May 30, 2006
Jennifer Chergo
Community Involvement Center
U.S. EPA, Region 8
999 - 18th St., Suite 300
Denver, CO 80202-2466

Robert P. Burns
P.O. Box 52
Franktown, CO
80116-0052

RE: Docket ID #EPA-HQ-SFUND-0002

Dear Ms. Chergo:

How inspiring it was to me when I read recently that the wildlife refuge being developed at Rocky Mountain Arsenal could soon more than double in size now that the clean up effort by the Army and Shell Oil Co. of a 1,399-acre tract of land is complete, and that the EPA is proposing that it be removed from their super fund list, which action would allow the Army to transfer said land to the U.S. Fish and Wildlife Service for their keeping and under their management.

I fully support such a proposal and such action on the part of the EPA and the Army, as I have visited the Arsenal a number of times to view the wildlife there, — on one occasion to be briefed by Shell in detail on clean up procedures, which as described were very reassuring to me, concerning the thoroughness and success of the job being done. I intend to continue to visit the Arsenal in the future in order to witness the unfolding of an amazing wildlife accomplishment in a large metropolitan area, which project could well become a worldwide model for reclamation of injured lands.

Sincerely,

Robert Burns

William F. Dowell
205 Vaughn Street
Aurora, CO 80011-8630
303 366 8389
11 June 2006

Ms Jennifer Chergo
Community Involvement Coordinator
US Environmental Protection Agency
999 18th Street, Suite 300
Denver, CO 80202-2466

Dear Ms Chergo

I am writing to add my support to the pending delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the US Army and Shell Oil Company, in coordination with the EPA, the State of Colorado and Tri-County Health Department have completed the required remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working hard to realize its vision of transforming the site into a premier urban national wildlife refuge which will be a permanent asset to the metropolitan area. The potential transfer of this land to the US Fish and Wildlife Service is another major step toward the expansion of this refuge.

I was an employee at the Arsenal for 26 years and have been a Refuge volunteer since my retirement from the Arsenal in 1991 (15 years). I speak of first hand experience, I am confident that the agencies involved in the Arsenal cleanup have done a safe and thorough job. The IPDA is clean, and is ready and should become part of the Refuge. The Arsenal is home to quite a variety of wildlife, we are fortunate to have it in our backyard. The delisting of the IPDA will be an important step in the continuing growth of the RMA National Wildlife Refuge. I look forward to seeing the EPA, State of Colorado and Tri-County Health Department work with the Army, Shell and the US Fish and Wildlife Service to ensure this process proceeds as quickly as possible in the best interests of the local community and all of the American people.

Thanking you in advance, I remain,

Sincerely,



Wm. F. Dowell

June 5, 2006
1106 Saint Francis Ave.
Modesto, CA 95356-9121

Ms. Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999 18th Street, Suite 200
Denver, CO 80202-2466

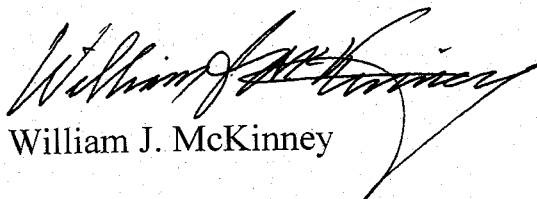
Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). Having been deeply involved in the process of remediating the Arsenal for over a decade, I am confident that the U.S. Army and Shell Oil Co., in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

Arsenal staff and contractors have been working to realize a vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to Denver and the front range communities. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

The Rocky Mountain Arsenal has played an important role in the life of our nation, and I am pleased to know that it will continue to serve as a valuable cultural, environmental and recreational asset. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure the delisting process proceeds expeditiously in the best interests of the Denver and front range communities.

Sincerely,



William J. McKinney

May 4, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Company, in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

I believe our community is fortunate to have the Rocky Mountain Arsenal in our backyard. The delisting of the IPDA is an important step in the continuing growth of the area and its economic and community well-being. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure this process proceeds expeditiously in the best interests of the community.

As an active Community Leader, see below, I can say that most of the people I work with in the Groups listed, are wholeheartedly in support of the delisting also.

Sincerely,

J. E. "Mac" McFarlin Jr.
4210 E. 70th Ave.
Commerce City, CO, 80022
maclona@msn.com

Chairman, C.I.A.C. (Citizens Improvement Advisory Committee)
Board Member, Prairie Gateway Authority
Vice Chairman, Commerce City Planning Commission
Commerce City Business and Professional Association

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Co., in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

The Rocky Mountain Arsenal has played an important role in the life of our nation, and I am pleased to know that it will continue to serve as a valuable cultural, environmental and recreational asset. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure the delisting process proceeds expeditiously in the best interests of the community.

Sincerely,

John D. Edwards
I support the expansion of
the Rocky Mountain Arsenal
as a Wildlife Refuge

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Co., in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

The Rocky Mountain Arsenal has played an important role in the life of our nation, and I am pleased to know that it will continue to serve as a valuable cultural, environmental and recreational asset. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure the delisting process proceeds expeditiously in the best interests of the community.

Sincerely,

James R. Friedman

P.S. I usually don't send form letters but this is one I believe in. As a former and possible future Denver area resident, I think the arsenal as a wildlife and park area next to a large city is a great idea. I have run the local roads in the area when staying at nearby hotels and this plan will greatly enhance that opportunity. *JRF*

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Co., in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

The Rocky Mountain Arsenal has played an important role in the life of our nation, and I am pleased to know that it will continue to serve as a valuable cultural, environmental and recreational asset. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure the delisting process proceeds expeditiously in the best interests of the community.

Sincerely,



*I believe this is a good next
step to take.*

W.R. Greene

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Co., in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

The Rocky Mountain Arsenal has played an important role in the life of our nation, and I am pleased to know that it will continue to serve as a valuable cultural, environmental and recreational asset. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure the delisting process proceeds expeditiously in the best interests of the community.

Sincerely,

W. E. McCool - Shell retiree!

28 years in Shell's production
department, Mid Continent, U.S.A.
Shell does it right.

W. E. McCool
5-19-2006

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Co., in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

The Rocky Mountain Arsenal has played an important role in the life of our nation, and I am pleased to know that it will continue to serve as a valuable cultural, environmental and recreational asset. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure the delisting process proceeds expeditiously in the best interests of the community.

Sincerely,

John A. Obel

I spent 6 years as on the
Clean up team for Shell. I'm
proud to say I was a small
part of the Clean up Operation
by Shell Oil Co.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Co., in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

The Rocky Mountain Arsenal has played an important role in the life of our nation, and I am pleased to know that it will continue to serve as a valuable cultural, environmental and recreational asset. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure the delisting process proceeds expeditiously in the best interests of the community.

Sincerely,

*I whole heartedly endorse this program
I have known Shell and the army would do a
Great job.*

*yours
Richard W. Greene*

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

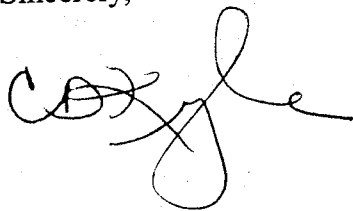
Dear Ms. Chergo:

I am writing to support the upcoming delisting of the Rocky Mountain Arsenal property known as the Internal Parcel Deletion Area (IPDA). I am confident that the U.S. Army and Shell Oil Co., in coordination with the EPA, State of Colorado and Tri-County Health Department, have performed the necessary remediation activities to ensure the land is fully protective of human health and the environment.

The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

The Rocky Mountain Arsenal has played an important role in the life of our nation, and I am pleased to know that it will continue to serve as a valuable cultural, environmental and recreational asset. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure the delisting process proceeds expeditiously in the best interests of the community.

Sincerely,

A handwritten signature in black ink, appearing to read "Chergo", with a stylized flourish at the end.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

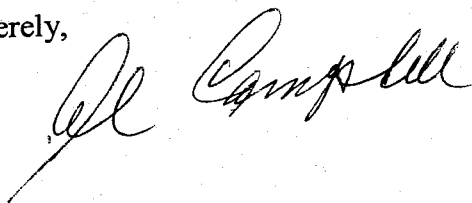
Dear Ms. Chergo:

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The Rocky Mountain Arsenal has played an important role in the life of our nation, and I am pleased to know that it will continue to serve as a valuable cultural, environmental and recreational asset. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure the delisting process proceeds expeditiously in the best interests of the community.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Campbell", is written over the "Sincerely," text.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

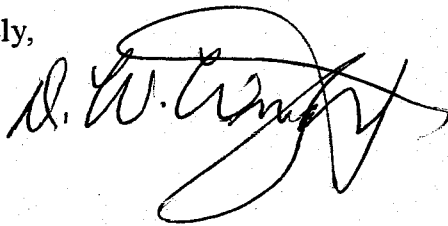
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Sincerely,

A handwritten signature in black ink, appearing to read "D. W. Trump". The signature is stylized with a large, sweeping loop at the end.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #EPA-HQ-SFUND-1987-0002

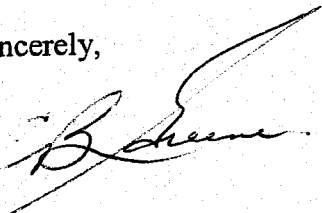
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Sincerely,

A handwritten signature in black ink, appearing to read "B. Schene", with a stylized flourish extending upwards and to the right.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

John A. Streich

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

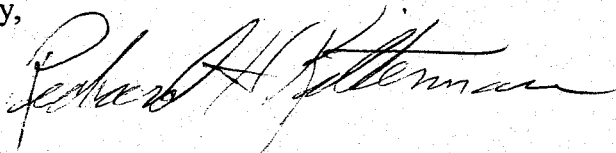
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Sincerely,

A handwritten signature in dark ink, appearing to read "Richard A. Korman". The signature is fluid and cursive, with the first name "Richard" being more prominent and the last name "Korman" following in a similar style.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

Shanda E. Kitterman

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,



J. L. Latta, MT 59041

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

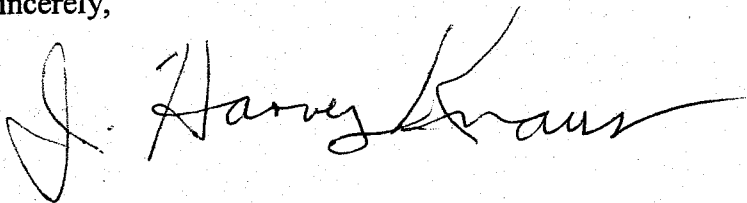
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Sincerely,

A handwritten signature in dark ink, appearing to read "J. Harvey Kraus". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

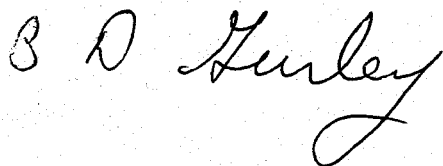
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Sincerely,

A handwritten signature in cursive script, reading "B D Hurley". The signature is written in dark ink and is positioned below the "Sincerely," text.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

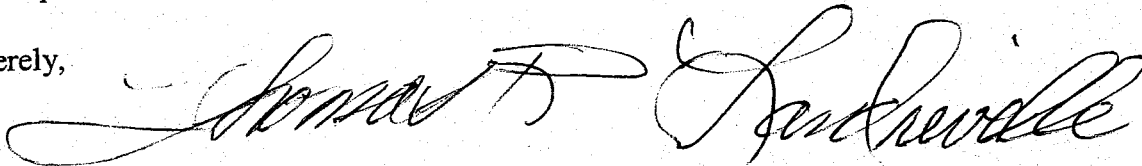
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Sincerely,

A handwritten signature in cursive script, appearing to read "Senator Tom Lundberg". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

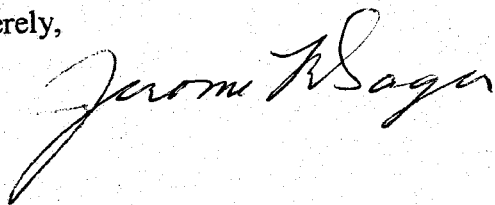
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Sincerely,

A handwritten signature in cursive script, appearing to read "Jerome H. Bagin". The signature is written in dark ink and is positioned below the word "Sincerely,".

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

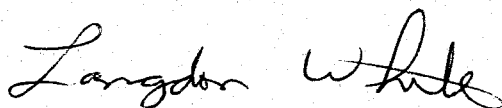
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Sincerely,

A handwritten signature in cursive script that reads "Langdon White". The signature is written in dark ink and is positioned below the "Sincerely," text.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

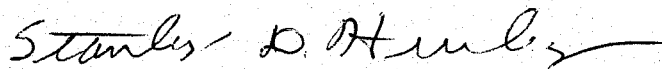
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Sincerely,



May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

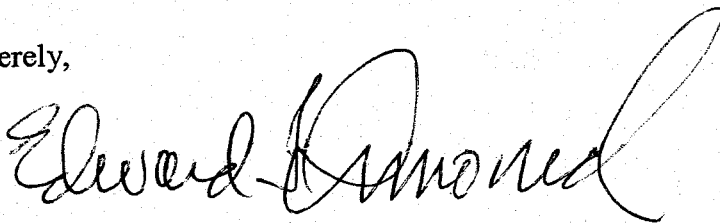
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Sincerely,

A handwritten signature in black ink, appearing to read "Edward R. Monahan". The signature is fluid and cursive, with a large, sweeping loop at the end.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

James A. Campbell

May 26, 2006

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

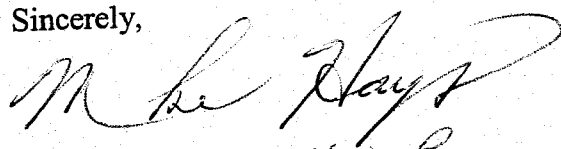
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Sincerely,


6554 Willow Brook Trail
Littleton, CO 80125

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

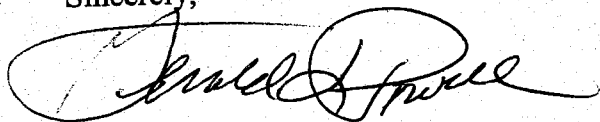
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Sincerely,

A handwritten signature in black ink, appearing to read "Donald D. Smith", written over a horizontal line.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

A handwritten signature in cursive script, appearing to read "B. E. Newman".

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #EPA-HQ-SFUND-1987-0002

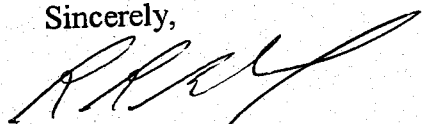
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Sincerely,



R. R. Boudreaux

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

A handwritten signature in cursive script, appearing to read "W. Trestlik".

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

B. J. Plegge
Ret./Shell Chem. Co.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

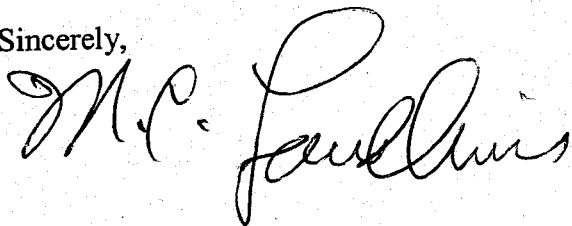
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Sincerely,

A handwritten signature in cursive script, appearing to read "M.C. Paulinus". The signature is written in dark ink and is positioned below the word "Sincerely,".

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

Frederick Comendant
Frederick Comendant

1883 Deer Park Cir. S
Grand Junction CO 81503

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

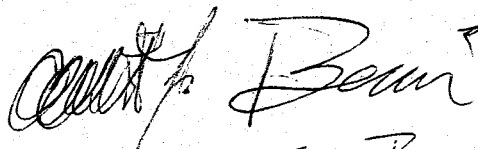
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Sincerely,


Albert J. Berni
41 Marmot Ct.
Ridgway CO 81432

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

Charles Wilson
Evergreen Colorado

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

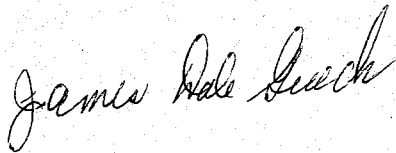
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Sincerely,

A handwritten signature in cursive script, reading "James Dale Guich".

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

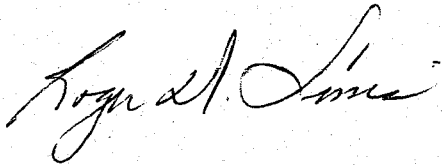
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Sincerely,

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May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,



R L Kuhns
272 Solomon Dr
Estes Park, CO 80517

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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Sincerely,

Everett Knipp
Box 956
BAILER, MT 59313

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

Walter E. Trocette
150 Kahl St.
Broomfield, Co. 80020

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

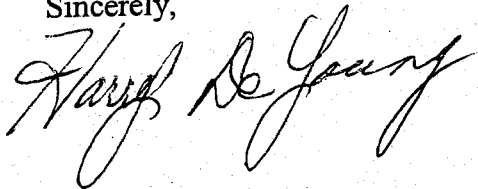
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Sincerely,

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May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
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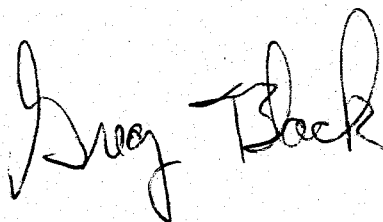
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Sincerely,

A handwritten signature in black ink, appearing to read "Guy Beck". The signature is fluid and cursive, with the first name "Guy" and the last name "Beck" clearly distinguishable.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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Sincerely,

L. J. Romero
Shell Oil Retiree
205 12TH ST
Fowler, CO. 81039

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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Sincerely,

Anthony S Bruski

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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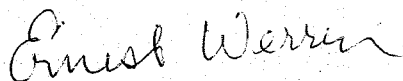
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U.S. Environmental Protection Agency, Region 8
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Sincerely,



B.P. BRINKLEY
43 TWO BITS ST.
BAILEY, CO, 80421

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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Sincerely,

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May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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Sincerely,

James S. Lanzetta
Shell Retiree

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

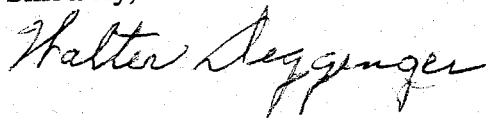
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May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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Sincerely,

James M. Lunden
Parker, CO 80138

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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Sincerely,

William D. Kilborn
5650 W. Quincy Ave. #3
Denver, CO 80235

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

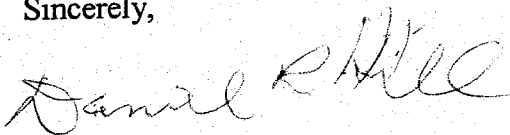
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Sincerely,

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May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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The Arsenal is working to realize its vision of transforming the site into a premier urban national wildlife refuge that will be a permanent asset to our community. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

The Rocky Mountain Arsenal has played an important role in the life of our nation, and I am pleased to know that it will continue to serve as a valuable cultural, environmental and recreational asset. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure the delisting process proceeds expeditiously in the best interests of the community.

Sincerely,

A handwritten signature in black ink, appearing to read "W. A. Olson", with a long, sweeping horizontal stroke extending to the right.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

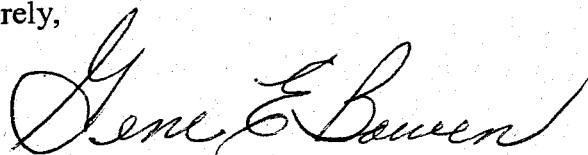
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Sincerely,

A handwritten signature in cursive script, reading "Gene E. Bowen". The signature is written in dark ink and is positioned below the word "Sincerely,".

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

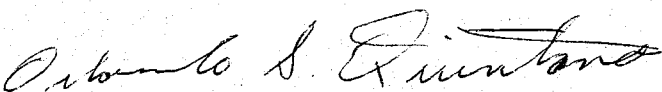
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May 20, 2006

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Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
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Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

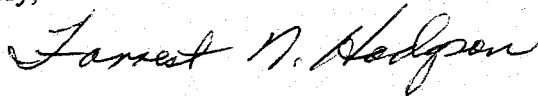
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U.S. Environmental Protection Agency, Region 8
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Denver, CO 80202-2466

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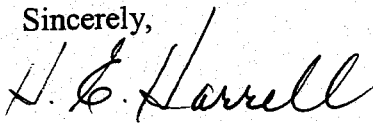
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May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

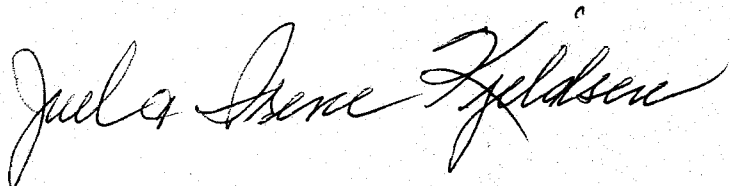
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Sincerely,



Mr. Juel A. Kjeldsen
12345 Lindsey Ln.
Colorado Springs, CO 80908-3706

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

John Bulmer
PO Box 543
Newcastle, WY 82701

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

Roger J. L. Marx
Shell Referee

June 1, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #EPA-HQ-SFUND-1987-0002

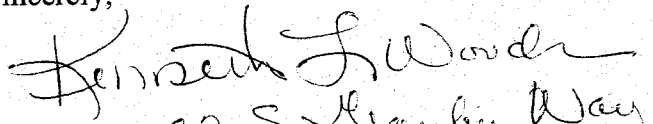
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Sincerely,


1092 S. Granby Way
Aurora, Co. 80012

May 4, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

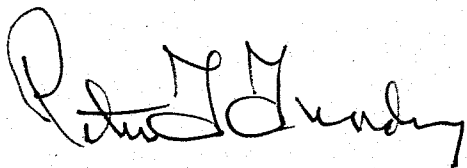
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Sincerely,


7900 N. Dargatz
Denver CO 80220

May 4, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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Sincerely,

Phillip B. Truitt
Manager
Flyper LLC

May 4, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

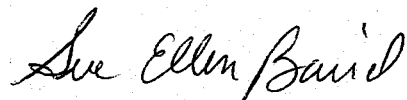
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Sincerely,

A handwritten signature in cursive script that reads "Sue Ellen Baird". The signature is written in dark ink and is positioned below the "Sincerely," text.

March 3, 2006

Max Dodson
Assistant Regional Administrator
Laura Williams
Project Manager
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

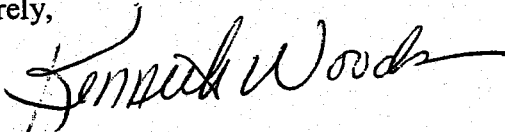
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Sincerely,



RECEIVED

MAR 03 2006

EPR-10



Stapleton Development Corporation

7350 E. 29th Ave., Suite 300
Denver, CO 80238

(303) 393-7700 main
(303) 393-6805 fax

April 28, 2006

Ms. Jennifer Chergo
Community Involvement Coordinator (8OC)
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 300
Denver, CO 80202-2466

Dear Ms. Chergo:

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The Arsenal is performing an important community service in an outstanding wildlife refuge. The potential transfer of this land to the U.S. Fish and Wildlife Service is another major step toward the expansion of this Refuge.

As a resident of this area and civic leader, I believe our community is fortunate to have the Rocky Mountain Arsenal adjacent to Stapleton. The delisting of the IPDA is an important step in the continuing responsible transformation of the area and its economic and community well-being. I anticipate seeing the EPA, State of Colorado and Tri-County Health Department work with the Army and the Fish and Wildlife Service to ensure this process proceeds expeditiously in the best interests of our community.

Sincerely,

Richard L. Anderson
President and CEO

March 3, 2006

Max Dodson
Assistant Regional Administrator
Laura Williams
Project Manager
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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Sincerely,

Allison May
Assistant Director
Community Enterprise .

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

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Sincerely,

B.F. Guesin by Dorothy M. Guesin, P.O.A.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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Sincerely,

Ronald W Brown

*5712 Greengate Way
Highlands Ranch, Co 80130*

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

RE: Docket ID #-EPA-HQ-SFUND-1987-0002

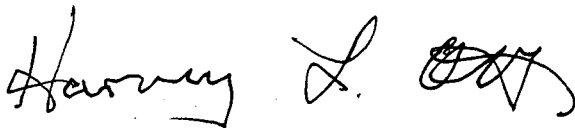
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Sincerely,



Shell Oil, Retired 1988

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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U.S. Environmental Protection Agency, Region 8
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Sincerely,

A handwritten signature in black ink, appearing to be "A. J. Smith", written over a horizontal line.

May 20, 2006

Jennifer Chergo
Community Involvement Coordinator
U.S. Environmental Protection Agency, Region 8
999-18th Street, Suite 200
Denver, CO 80202-2466

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Sincerely,

Floyd D. Burnside

ATTACHMENT C

LIST OF ACRONYMS AND ABBREVIATIONS

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ARAR	Applicable or Relevant and Appropriate Requirement
ARMY	Department of the Army
ASTM	American Society of Testing and Materials
BCY	Bank Cubic Yards
CCR	Construction Completion Report
CDPHE	Colorado Department of Public Health and Environment
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CMP	Comprehensive Monitoring Program
COC	Contaminant of Concern
CRA	Central Remediation Area
CSV	Contingent Soil Volume
DREZ	Demolition Range Exclusion Zone
DIMP	Diisopropylmethylphosphonate
EPA	U.S. Environmental Protection Agency
ESD	Explanation of Significant Differences
FFA	Federal Facility Agreement
FYR	Five-Year Review
FYRR	Five-Year Review Report
FS	Feasibility Study
GC/MS	Gas Chromatography/Mass Spectrometry
GWSAP	Rocky Mountain Arsenal Ground-water Sampling and Analysis Plan
HHE	Human Health Exceedance (Soil that exceeds acceptable contaminant levels for protection of human health)
HWL	Hazardous Waste Landfill
IC	Institutional Control

IEA/RC	Integrated Endangerment Assessment/Risk Characterization Report
IRA	Interim Response Action
IRMAICP	Interim Rocky Mountain Arsenal Institutional Control Plan
JARDF	Joint Administrative Record Document Facility
LTMP	Long Term Monitoring Plan for Groundwater
MEC	Munitions and Explosives of Concern
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NOIDp	Notice of Intent for Partial Deletion
NPL	National Priorities List
OCP	Organochlorine Pesticide
OE/RCWM	Ordinance/Explosives and Recovered Chemical Warfare Materiel
O&M	Operation and Maintenance
OU	Operable Unit
OSWER	Office of Solid Waste and Emergency Response
PM-10	Particulate Matter less than 10 Microns in Diameter
RCRA	Resource Conservation and Recovery Act
REFUGE	Rocky Mountain Arsenal National Wildlife Refuge
REFUGE ACT	1992 Rocky Mountain Arsenal National Wildlife Refuge Act
RI	Remedial Investigation
RMA	Rocky Mountain Arsenal
ROD	Record of Decision
RVO	Remediation Venture Office
SafeRAC	Safe RMA Access and Control
SAR	Study Area Report
SDA	Surface Deletion Area
SPA	Selected Perimeter Area
SW	Solid Waste
SHELL	Shell Oil Company
SWAQMP	Site-Wide Air Quality Monitoring Program Plan

SSAB	Site-Specific Advisory Board
SVOC	Semi-volatile Organic Compound
TCLP	Toxicity Characteristic Leaching Procedure
TRER	Terrestrial Residual Ecological Risk
TSP	Total Suspended Particulate
USFWS	U.S. Fish & Wildlife Service
VOC	Volatile Organic Compound
WRCP	Well Retention and Closure Program [Plan] for RMA
WTP	Western Tier Parcel